

October 9, 2008

Hercules Incorporated
Research Center
500 Hercules Road
Wilmington, DE 19808-1599
(302) 995-3000
www.herc.com

Mr. Jerry B. Banks – PE, BCEE – Chief
MDEQ-GARD
Office of Pollution Control
P.O. Box 2261
Jackson, MS 39225-2261



Dear Mr. Banks:

This letter is a follow up response to your letter of June 9, 2008 in which you asked a series of questions related to our planned closure of our impounding basin and equalization tank. Hercules provided MDEQ a response to all the questions on July 7 2008.

To make our responses easier to follow, I have reprinted your questions preceding each response.

MDEQ Question 4. *An analyses of sludge contained in the proposed lagoons. The analyses of a minimum of 2 (two) composite sludge samples from each of the lagoons, depending on the depth and potential layering of the sludges in the lagoons, should include pH, percent solids, sulfide, cyanide, including TCLP analyses for metals, volatiles, semi-volatiles, herbicides, and pesticides. Each composite sample should be comprised of 5 representative sludge samples collected from 5 different areas of the proposed lagoon. In order to process this matter effectively and efficiently the MDEQ recommends that you use an independent third party laboratory for sampling and analysis of these samples.*

Hercules Follow-up Response

Composite samples consisting of five aliquots were collected from Et-10 (SS-3) and two samples were taken from the Impounding Basin (IB). The IB samples were taken from the east (SS-2) and west areas (SS-1) of the basin which are separated by a baffle. The results of the samples SS-2 and SS-3 demonstrated that these sludges were non-hazardous and these waste streams were profiled and accepted at the Pine Belt Regional Landfill. However, the results of SS-1 indicated that the some of the sludges in this part of the Basin may be characteristic Hazardous Waste for Benzene. Hercules then proceeded to reanalyze and resample this section. The results of this analyses are described in the attached report.

Based on the analysis in this report Hercules proposed to remove and dispose of the Hazardous Waste sludges in this section in the following manner:

The western area will be isolated by using sheet pile or other suitable means. Upon removal of the contents of the western portion of the basin, Hercules proposes the collection of confirmatory soil samples. Hercules proposes that the samples shall be collected from the earthen walls and floor. Based on the earthen basin's dimensions, 70' x 65' x 8', Hercules proposes the collection of nine (9) samples from the three (3) walls, three (3) samples per wall, and nine (9) samples from the floor. Sample collection will be in accordance with the protocols outlined by the US EPA Region IV and the Mississippi Department of Environmental Quality. Samples will be collected via the use of Terra Core™ soil samplers, in accordance with USEPA SW-846 Method 5035. The eighteen (18) samples will be submitted to an NELAC approved laboratory for analysis for Benzene by EPA method 8021. If soil sample concentrations are below the MDRQ TRG for Industrial Clean up for benzene, 1.36 ppm, all over excavation activities shall cease. In the event that sample results are found to be greater than 1.36 ppm, over excavation and sampling activities shall recommence.

MDEQ Question 6. The anticipated time for completion of the proposed closure;

Hercules Follow-Up Response

We have selected a contractor(s) and plan to start the work in the fourth quarter. The work is planned for completion in 2008.

MDEQ Question 10. A plan to effectively manage odor during the sludge removal process must be developed. Also, notification of the Mayor and other stakeholders of the proposed closure project should be done well in advance of the actual closure because of all the recent problems in Hattiesburg with odor complaints. Also, we suggest that you include references to the removal of wastewater for treatment and disposal in the letter of notification, especially

Hercules Follow-up Response

We required bidders in the contractor bid process for the sludge removal to include a plan for how they will manage odor control. Attached is the Clean Harbors plan to address odors during the sludge removal and loading process.

As indicated in the two letters we previously sent MDEQ, we have implemented, or will implement prior to taking the units out of service, all the suggestions that you have provided.

Hercules looks forward to meeting or conducting a conference call with the MDEQ to answer any questions your or your staff may have and to resolve any concerns at your earliest convenience, as Hercules is planning to begin its work promptly. If possible, we would like to set up a conference call on Tuesday, October 14, 2008.

Please feel free to contact me at (414) 461-4000, ext. 157, Tim Hassett at (302) 995-3456 or Charlie Jordan at (601) 584-3360 to set up the meeting, or if you have any questions we may answer by phone.

Sincerely,



Rod Bolton
for
Rod Bolton
Regional Manager

RB/ijc

Enclosures:

1. Clean Harbors Odor Management Plan
2. Sludge Sampling Analyses Report

cc: R. L. Williams/Hercules
T. D. Hassett/Hercules
C. Jordan/Hercules-Hattiesburg

Clean Harbors Odor Management Plan



**Hercules Corp.
Hattiesburg, Mississippi**

Odor Management & Air Sampling Plan

The following paragraphs outline Clean Harbors' proposed Odor Management and Air Sampling Plan for the Hercules Hattiesburg facility, located in Hattiesburg, Mississippi.

Please note that in addition to the measures described below, the physical and chemical nature of the solidification agent, in this case fly ash, is composed primarily of oxides comprised of silicon, magnesium, and calcium and associated alkalies, which provides odor suppression similar to lime.

Odor Management

Clean Harbors proposes the use of a foam based odor agent for the duration of the project to mask and/or eliminate potential odors encountered from the sludge during dewatering, excavation, solidification and transportation and disposal of sludge. Odor Management activities will be in effect during any period when odors are present or material is being moved.

AC-645 Long Duration Foam is a patented product that produces a thick, long-lasting, viscous foam barrier for immediate control of dust, odors and volatile organic compounds (VOCs). AC-645 is designed for use with Rusmar Pneumatic Foam Units.

AC-645 foam is recognized by the Environmental Protection Agency and the U.S. Army Corps of Engineers as that which provides superior emission control for a period up to 17 hours. AC-645 has been specified for use at Superfund and other hazardous waste sites across the United States and Canada.

The remediation of hazardous waste sites often includes excavation of soil contaminated with odorous compounds. AC-645 has little or no odor itself. It forms a barrier between contaminants and the atmosphere and can be applied during active excavation to provide an immediate and effective barrier to minimize or eliminate odors. It is completely biodegradable and poses no threat to workers, neighboring residents or groundwater. Furthermore, AC-645 will not add to soil volume or treatment costs.

AC-645 can also be applied on top of trucks for emission control during transport of materials such as contaminated soils or sewage sludge. Ammonia tests performed on trucks containing sewage sludge resulted in a drop of concentration levels from 170 ppm prior to foaming down, to 6 ppm following the application of AC-645.



Air Sampling

Clean Harbors proposes using Draeger™ tubes for the daily collection (at a minimum), of air samples. Per the specifications outlined in the RFP, Clean Harbors will utilize 9 tubes for the sampling of sulfide and nitrogen compounds, benzene, toluene, epichlorohydrin, ethylene, ammonia, mercaptans and phenols. Air sampling activities will be in effect during the entire project. Sample results will be logged and reported daily to the Hercules on site Engineer.

In addition, Clean Harbors proposes using a Photo Ionization Device (PID) for the collection of air samples from the perimeter of the field activities zone on an hourly basis, and logging the results for recordkeeping purposes. In the event that an air sampling indicates excessive levels, Clean Harbors will notify Hercules' on site supervisor and request direction for the collection of additional air samples via Draeger™ tubes and propose alternative actions to mitigate problematic odors, such as additional foam control, oxidative or other chemical treatment (hypochlorite addition) as well.

Sludge Sampling Analyses Report

MEMORANDUM

To: Timothy Hassett
Hercules, Incorporated

From: Charles Coney
Eco-Systems, Inc. 

Date: October 3, 2008

Re: Sludge Sample Analyses
Hattiesburg, Mississippi

At your request, Eco-Systems has conducted sampling of sludges from the wastewater impoundment and the wastewater holding tank and submitted those samples for analysis. The purpose of the sludge sampling effort was to characterize the sludge for disposal as part of the forthcoming sludge removal project. In general, the sampling was conducted and the samples were analyzed according to information supplied by Hercules. Initial sampling was conducted on July 1, 2008, and re-sampling of one area was conducted on July 30, 2008 and September 4, 2008. Samples were submitted to TestAmerica Laboratories, Inc. (TestAmerica) of Savannah, Georgia for analysis. A split of the sample collected on July 30, 2008 was also submitted to Bonner Analytical and Testing Company (BATCO).

Background

Hercules began conducting improvements to the Hattiesburg facility in 2006. These improvements include removing unused facilities from the site. Since facility operations no longer require on-site wastewater treatment, wastewater at the site is being discharged, under permit, to the municipal wastewater treatment system. Since the existing wastewater impoundment basin and wastewater holding tank are no longer necessary, Hercules has contracted for the removal and disposal of the sludges contained in the two structures. Following removal of the sludges, the holding tank and structures associated with the impoundment basin will be demolished and removed. The remaining excavations will be backfilled, graded, and landscaped. Prior to backfill of the impoundment, confirmation sampling will be conducted to ensure that soil containing concentrations of constituents above regulatory limits has been removed.

Hercules notified the MDEQ of their intent to close the impoundment basin and holding tank in a letter dated April 22, 2008. In response to the notification, the MDEQ requested in a letter dated June 8, 2008 additional information regarding the closure operations including a request for Hercules to characterize the sludge prior to generation. The sludge sampling reported in this memo was conducted in response to the request from the MDEQ.

Historical Sampling and Analysis

Sludge samples from the site have been analyzed on seven other occasions since 1990. Six of these samples were collected from the wastewater treatment basin, and one sample was collected from the sludge disposal pits, which are located in the northwestern portion of the site. The analyses conducted for the seven samples included TCLP VOCs, SVOCs, and metals. Analysis for TCLP pesticides, herbicides, and PCBs, reactivity, corrosivity, and ignitability was also conducted on five of the seven samples. Concentrations of benzene, 1,1-dichloroethene, chlorobenzene, 2-butanone, chloroform, methyl phenols, cresols, dieldrin, barium, cadmium, chromium, lead, and selenium have been detected in one or more samples at concentrations less than their respective TCLP limits. Other tests for hazardous characteristics (corrosivity, reactivity, and ignitability) have not indicated that the sludge is hazardous. Historical analytical results are attached.

Samples Collected July 1, 2008

During the initial sampling, three composite samples were collected. Samples SS-1 & SS-2 were collected from the wastewater impoundment, and sample SS-3 was collected from the wastewater holding tank. Samples SS-1 and SS-2 were each composed of 5 aliquots collected from the perimeter of the wastewater impoundment. The aliquots for sample SS-1 were collected from the west end of the impoundment, and the aliquots for SS-2 were collected from the east end of the impoundment. The western end of the wastewater impoundment, which is the influent end of the impoundment, is approximately one quarter of the total area of the impoundment and is separated from the eastern end of the impoundment by a baffle. The baffle slows the flow of wastewater through the impoundment, which forces heavier solid material to precipitate. Consequently, sludge on the west side of the baffle generally has a higher solid content than sludge on the eastern side of the baffle. Much of the sludge on the western side of the baffle is also covered by resinous cap of dried sludge ranging from approximately six inches to one foot in thickness. Aliquot locations for SS-1 and SS-2 are shown on the attached Figure 1.

Sample SS-3 was composed of two aliquots collected from the platform on the western rim of the tank and one aliquot collected from the platform on the eastern rim of the tank.

Each sample aliquot was collected with a decontaminated hand auger. The samples were collected by pushing the hand auger through the upper, relatively solid, surficial sludge and then, to the extent practical, vertically mixing the aliquot location. This was accomplished by pumping the hand auger from the surface to the base of the sludge or the limit of the auger rods, whichever was shallower. After mixing, the aliquot was collected and placed on clean plastic sheeting. Aliquots were composited in the field using stainless steel spoons and placed in laboratory supplied containers. Samples collected on July 1, 2008 were analyzed according to the TCLP for VOCs, SVOCs, Pesticides, PCB, Herbicides, and Metals, and also for reactive cyanide, reactive sulfide, pH (corrosivity) and percent solids.

Analysis for sample SS-1 detected 1.3 mg/L of benzene in the leachate. Per federal regulations, if TCLP benzene concentrations are 0.5 mg/L, or above, the waste is considered hazardous by the characteristic of toxicity. Benzene was detected in sample SS-2 at a concentration of 0.21 mg/L and was not detected in sample SS-3. Chloroform was also detected in the sample collected from SS-1 at a concentration of 0.19 mg/L, which is less than the TCLP limit of 6 mg/L. Other VOCs were not detected in the three samples.

Total methyl phenols, which are SVOCs, were detected in the three sludge samples at concentrations ranging from 0.18 mg/L in sample SS-3 to 0.72 mg/L in sample SS-2. Methyl Phenols are not listed in 40CRF 261.24, therefore the maximum concentration for toxicity characteristic is not available.

Pesticides, PCBs, herbicides, and metals were not detected. PH ranged from 5.59 in sample SS-1 to 6.89 in sample SS-3. Reactive cyanide and sulfide were not detected.

Sample Collected July 30, 2007

At the request of Hercules, Eco-Systems conducted re-sampling of SS-1 to confirm the presence of benzene at concentrations above the TCLP limit in the western end of the wastewater impoundment. Sample SS-1-073008 was composited from five aliquots that were collected in approximately the same locations as the previous sample SS-1-070108. (The last 6 digits of the sample I.D. are the collection date.) Sample SS-1-073008 was submitted to TestAmerica for analysis of VOCs by the TCLP. A split of the sample was also submitted to BATCO for the same analysis.

Analytical results of the sample split submitted to TestAmerica detected benzene at a concentration of 0.44 mg/L. Analytical results of the sample split submitted to BATCO detected benzene at a concentration of 0.586 mg/L. Other VOCs were not detected in either split of sample SS-1-073008.

Samples Collected September 4, 2008

After consideration of previous sludge sample analytical results, a third sampling event was conducted to investigate whether benzene concentrations detected in previous samples collected from the western end of the wastewater impoundment were the result of influence from aliquots collected from a localized area of elevated benzene concentration. During the third sampling event, six samples, SS-5 through SS-10, were collected from discrete locations, which are shown on Figure 1. Samples collected from each of the six locations were mixed vertically, as described for the July 1, 2008 sampling event. The six discrete samples were submitted to TestAmerica for analysis of VOCs by the TCLP.

Benzene concentrations detected in the samples are shown in the Table 1. Benzene concentrations in samples SS-5, SS-6, and SS-8 are above the TCLP limit for benzene.

Benzene concentrations in samples SS-7, SS-9, and SS-10 are below the TCLP limit for benzene. Carbon tetrachloride and chloroform were also detected in sample SS-8 at concentrations less than TCLP limits for those compounds.

TABLE 1
SUMMARY OF TCLP BENZENE ANALYTICAL RESULTS
Samples Collected September 4, 2008

Location	Date Collected	TCLP Benzene (mg/L)
SS-5	9/4/2008	5.5
SS-6	9/4/2008	3.2
SS-7	9/4/2008	0.4
SS-8	9/4/2008	3.2
SS-9	9/4/2008	0.043
SS-10	9/4/2008	0.062
Average Concentration ¹	-	0.626
TCLP Limit		0.5

¹ - Logarithmic mean

Backfill Material

The excavation that remains after sludge removal and demolition of the wastewater impoundment will be backfilled with soils obtained from an onsite source located in the (describe area of site) portion of the site. In order to characterize potential fill materials, a soil sample from the proposed fill excavation area was collected on August 26, 2008 and submitted for analysis of VOCs, SVOCs, pesticides, herbicides, and PCBs. One VOC, tetrachloroethene, was detected at a concentration of 0.017 mg/kg, which is less than the TRG (restricted use) for tetrachloroethene of 18.2 mg/kg. SVOCs, pesticides, herbicides, and PCBs were not detected in the soil sample collected from the proposed fill excavation area.

Conclusions

Historical analytical results for samples collected between 1990 and 2001 do not indicate that wastewater sludge from the site is characteristically hazardous.

Analytical results for the samples collected from the east end of the wastewater impoundment and from the wastewater holding tank (SS-2 and SS-3) were submitted by Hercules to the MDEQ on September 15 & 18, 2008. Based on these analytical results, the MDEQ approved the waste streams represented by SS-2 and SS-3 for disposal in the Pine Belt Regional Landfill. The approval was provided in a letter dated September 19, 2008 from the MDEQ to the landfill. A copy of the letter is attached.

Based on the analytical results of the discrete samples collected from the western end of the wastewater impoundment on September 4, 2008, there would not appear to be a discrete area of the western end of the wastewater impoundment that is the source of the benzene detected in the earlier, composite samples.

The proposed source for backfill material to be used in the wastewater impoundment area appears suitable for use on site.

Recommendations

It is recommended that confirmation samples be collected from the excavation remaining after demolition of the wastewater impoundment. Confirmation soil samples should be collected from the sidewalls and bottom of the excavation and analyzed for benzene. If benzene is detected at concentrations above the applicable TRG in one or more confirmation samples, additional excavation may be necessary. If saturated soils are encountered in the excavation created by demolition of the wastewater impoundment, a sample of the water from the pit should be submitted for analysis in lieu of soil samples from the bottom of the excavation.

Attachments

- Attachment A Historical Analytical Results
- Attachment B Figure 1
- Attachment C Analytical Results - July 1, 2008
- Attachment D Analytical Results - July 30, 2008
- Attachment E Analytical Results - September 4, 2008
- Attachment F Analytical Results - Backfill Material
- Attachment G MDEQ Approval Letter

MEMORANDUM

To: Timothy Hassett
Hercules, Incorporated

From: Charles Coney
Eco-Systems, Inc.

Date: September 22, 2008

Re: Sludge Sample Analyses
Hattiesburg, Mississippi

At your request, Eco-Systems has conducted sampling of sludges from the wastewater impoundment and the wastewater holding tank and submitted those samples for analysis. In general, the sampling was conducted and the samples were analyzed according to information supplied by Hercules. Initial sampling was conducted on July 1, 2008, and re-sampling of one area was conducted on July 30, 2008 and September 4, 2008. Samples were submitted to TestAmerica Laboratories, Inc. (TestAmerica) of Savannah, Georgia for analysis. A split of the sample collected on July 30, 2008 was also submitted to Bonner Analytical and Testing Company (BATCO).

Samples Collected July 1, 2008

During the initial sampling, three composite samples were collected. Samples SS-1 & SS-2 were collected from the wastewater impoundment, and sample SS-3 was collected from the wastewater holding tank. Samples SS-1 and SS-2 were each composed of 5 aliquots collected from the perimeter of the wastewater impoundment. The aliquots for sample SS-1 were collected from the west end of the impoundment, and the aliquots for SS-2 were collected from the east end of the impoundment. The western end of the wastewater impoundment, which is the influent end of the impoundment, is approximately one third of the total area of the impoundment and is separated from the eastern end of the impoundment by a baffle. The baffle slows the flow of wastewater through the impoundment, which forces heavier solid material to precipitate. Consequently, sludge on the west side of the baffle generally has a higher solid content than sludge on the eastern side of the baffle. Much of the sludge on the western side of the baffle is also covered by resinous cap of dried sludge ranging from approximately six inches to one foot in thickness. Aliquot locations for SS-1 and SS-2 are shown on the attached Figure 1.

Sample SS-3 was composed of two aliquots collected from the platform on the western rim of the tank and one aliquot collected from the platform on the eastern rim of the tank.

Each sample aliquot was collected with a decontaminated hand auger. The samples were collected by pushing the hand auger through the upper, relatively solid, surficial sludge and then, to the extent practical, vertically mixing the aliquot location. This was accomplished by pumping the hand auger from the surface to the base of the sludge or the limit of the auger rods, whichever was shallower. After mixing, the aliquot was collected and placed on clean plastic sheeting. Aliquots were composited in the field using stainless steel spoons and placed in laboratory supplied containers. Samples collected on July 1, 2008 were analyzed according to the TCLP for VOCs, SVOCs, Pesticides, PCB, Herbicides, and Metals, and also for reactive cyanide, reactive sulfide, pH (corrosivity) and percent solids.

Analysis for sample SS-1 detected 1.3 mg/L of benzene in the leachate. Per federal regulations, if TCLP benzene concentrations are 0.5 mg/L, or above, the waste is considered hazardous by the characteristic of toxicity. Benzene was detected in sample SS-2 at a concentration of 0.21 mg/L and was not detected in sample SS-3. Chloroform was also detected in the sample collected from SS-1 at a concentration of 0.19 mg/L, which is less than the TCLP limit of 6 mg/L. Other VOCs were not detected in the three samples.

Total methyl phenols, which are SVOCs, were detected in the three sludge samples at concentrations ranging from 0.18 mg/L in sample SS-3 to 0.72 mg/L in sample SS-2. Methyl Phenols are not listed in 40CRF 261.24, therefore the maximum concentration for toxicity characteristic is not available.

Pesticides, PCBs, herbicides, and metals were not detected. PH ranged from 5.59 in sample SS-1 to 6.89 in sample SS-3. Reactive cyanide and sulfide were not detected.

Sample Collected July 30, 2007

At the request of Hercules, Eco-Systems conducted re-sampling of SS-1 to confirm the presence of benzene at concentrations above the TCLP limit in the western end of the wastewater impoundment. Sample SS-1-073008 was composited from five aliquots that were collected in approximately the same locations as the previous sample SS-1-070108. (The last 6 digits of the sample I.D. are the collection date.) Sample SS-1-073008 was submitted to TestAmerica for analysis of VOCs by the TCLP. A split of the sample was also submitted to BATCO for the same analysis.

Analytical results of the sample split submitted to TestAmerica detected benzene at a concentration of 0.44 mg/L. Analytical results of the sample split submitted to BATCO detected benzene at a concentration of 0.586 mg/L. Other VOCs were not detected in either split of sample SS-1-073008.

Samples Collected September 4, 2008

After consideration of previous sludge sample analytical results, a third sampling event was conducted to investigate whether benzene concentrations detected in previous

samples collected from the western end of the wastewater impoundment were the result of influence from aliquots collected from a localized area of elevated benzene concentration. During the third sampling event, six samples, SS-5 through SS-10, were collected from discrete locations, which are shown on Figure 1. Samples collected from each of the six locations were mixed vertically, as described for the July 1, 2008 sampling event. The six discrete samples were submitted to TestAmerica for analysis of VOCs by the TCLP.

Benzene concentrations detected in the samples are shown in the Table 1. Benzene concentrations in samples SS-5, SS-6, and SS-8 are above the TCLP limit for benzene. Benzene concentrations in samples SS-7, SS-9, and SS-10 are below the TCLP limit for benzene. Carbon tetrachloride and chloroform were also detected in sample SS-8 at concentrations less than TCLP limits for those compounds.

TABLE 1
SUMMARY OF TCLP BENZENE ANALYTICAL RESULTS
Samples Collected September 4, 2008

Location	Date Collected	TCLP Benzene (mg/L)
SS-5	9/4/2008	5.5
SS-6	9/4/2008	3.2
SS-7	9/4/2008	0.4
SS-8	9/4/2008	3.2
SS-9	9/4/2008	0.043
SS-10	9/4/2008	0.062
TCLP Limit		0.5

Conclusions

Based on the analytical results of the discrete samples collected on September 4, 2008, there would not appear to be a discrete area of the western end of the wastewater impoundment that is the source of the benzene detected in the earlier, composite samples.

~~HERCULES~~

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
CERTIFIED #: 7005 0390 0000 1703 9301

Hercules Incorporated
613 West 7th Street
Hattiesburg, MS 39401
(601) 545-3450
Fax: (601) 584-3226
www.herc.com

April 22, 2008

Jan Patton
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Ms. Patton:

The purpose of this letter is to outline Hercules' plans to exit both our industrial wastewater impounding basin and five million gallon wastewater equalization tank. As you are aware, the company is working towards completing two years of major downsizing operations, while at the same time, improving the remaining operations at Hattiesburg.

The exiting of these units, as outlined in our October 25, 2005 letter to Ms. Carla Brown, and subsequent discussions, is scheduled for completion in the 3rd quarter of 2008. The work will soon be awarded to the successful remediation contractor bid. The sludge will be removed and properly disposed in an approved subtitle D landfill. Once the sludge has been removed, without disturbing the clay bottom, the impounding basin will be back-filled with dirt.

During the final cleanout, we would anticipate some localized odor as a result of disturbing the sludge upon its removal. Any odor will most likely be a mercaptan or sulfur type odor. We will utilize the latest technology-based techniques, such as the possibility of pH adjustment, to minimize the generation of any odors. We anticipate the removal of approximately 10,000 cubic yards of sludge from both units.

Attached is a draft letter we intend to send to area residents before we actually start any sludge removal. We solicit any suggestions you may have as to the content of this letter, as well as how to best communicate this project to the City and to our neighbors. Our goal, of course, is to allay any fears or concerns that any of our neighbors may have.

In addition, attached are a total of seven different past sampling events of the sludge material. We would like to update this data and believe that it may be best if the update data is generated by the State. We would be happy to reimburse the State for the cost of any analysis.

We would like to discuss the above with you at your earliest convenience. Please contact Mr. Charles Jordan, our Environmental Professional, at 601-545-3360, or myself at 414-461-4000 ext. 157, so we may discuss our path forward, including community communications.

Sincerely,

Rodney S. Bolton
Regional Manager

Jan Patton
Bureau of Pollution Control
April 22, 2008
Page 2

Attachments:

cc: Toby Cook, MDEQ, CMRRR: 7005 0390 0000 1703 9318
Rick Sumrall, MDEQ, CMRRR: 7005 0390 0000 1703 9325
Carla Brown, MDEQ, CMRRR: 7005 0390 0000 1703 9332
Willie McKercher, MDEQ, CMRRR: 7005 0390 0000 1703 9349
Tim Hassett, Hercules Incorporated
Roger Moore, Hercules Incorporated

DRAFT

April 22, 2008

Honorable Mayor, Mr. Johnny Dupree, City of Hattiesburg
Mr. Terry Steed, Executive Director, Emergency Management District
Hercules Hattiesburg CAP members
Area Residents

Dear Neighbor:

The purpose of this letter is to make our community leaders and neighbors aware of current and future planned activities at the Hercules Incorporated Hattiesburg, Mississippi, plant. The company is working towards completing two years of major downsizing operations, while at the same time, improving the operations remaining at Hattiesburg.

This is most evident in the plants physical change with the removal of several past plant operating structures at the facility. The plant is also exiting both its industrial wastewater impounding basin and a five million gallon wastewater equalization tank. This is possible because of the major downsizing of operations that has taken place.

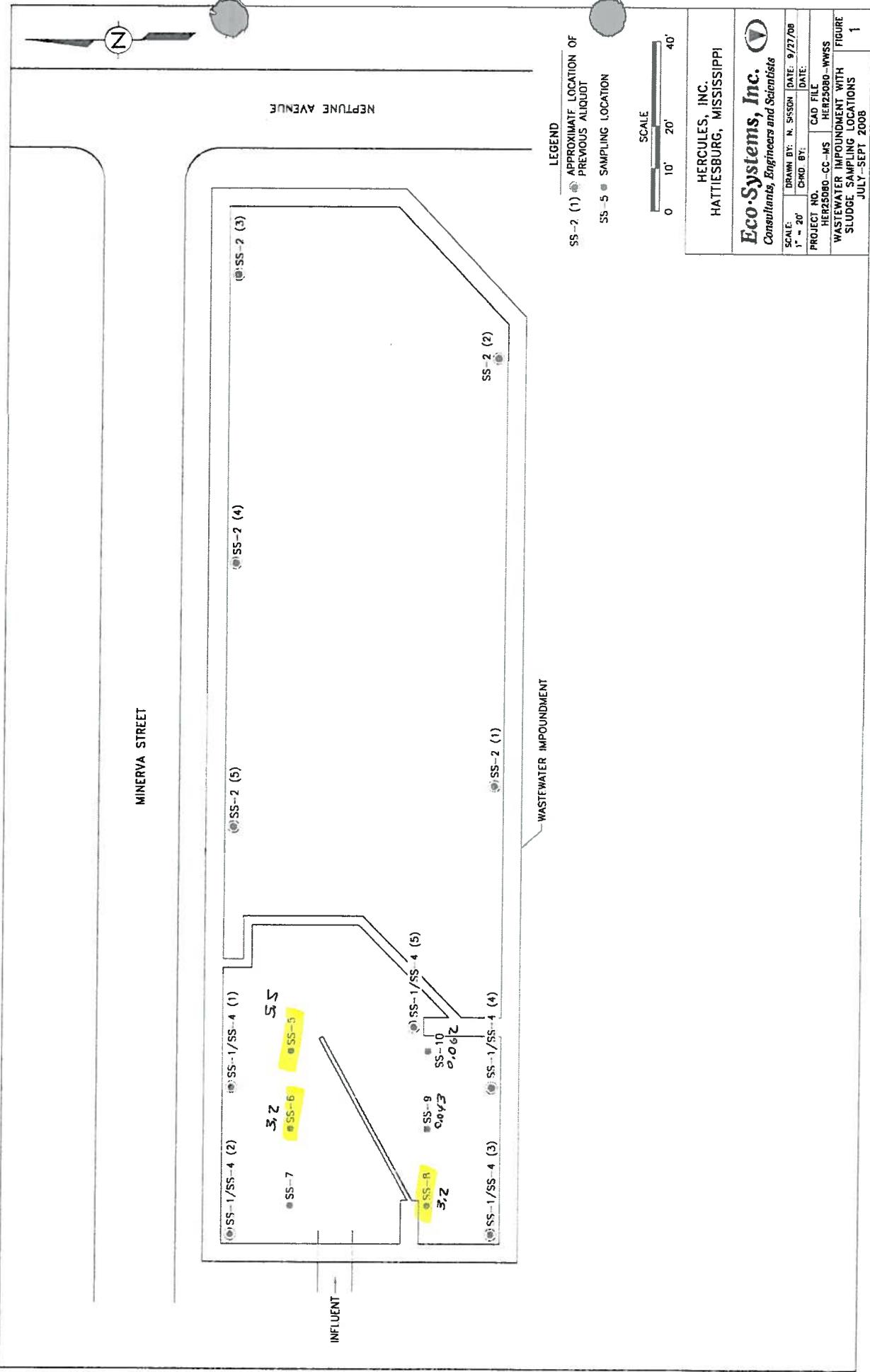
The exiting of both of these wastewater units will involve the cleanout of residual wastewater sludge. This work will be completed in concurrence with the Mississippi Department of Environmental Quality (MDEQ) oversight. The sludge will be removed and properly disposed of in an approved landfill.

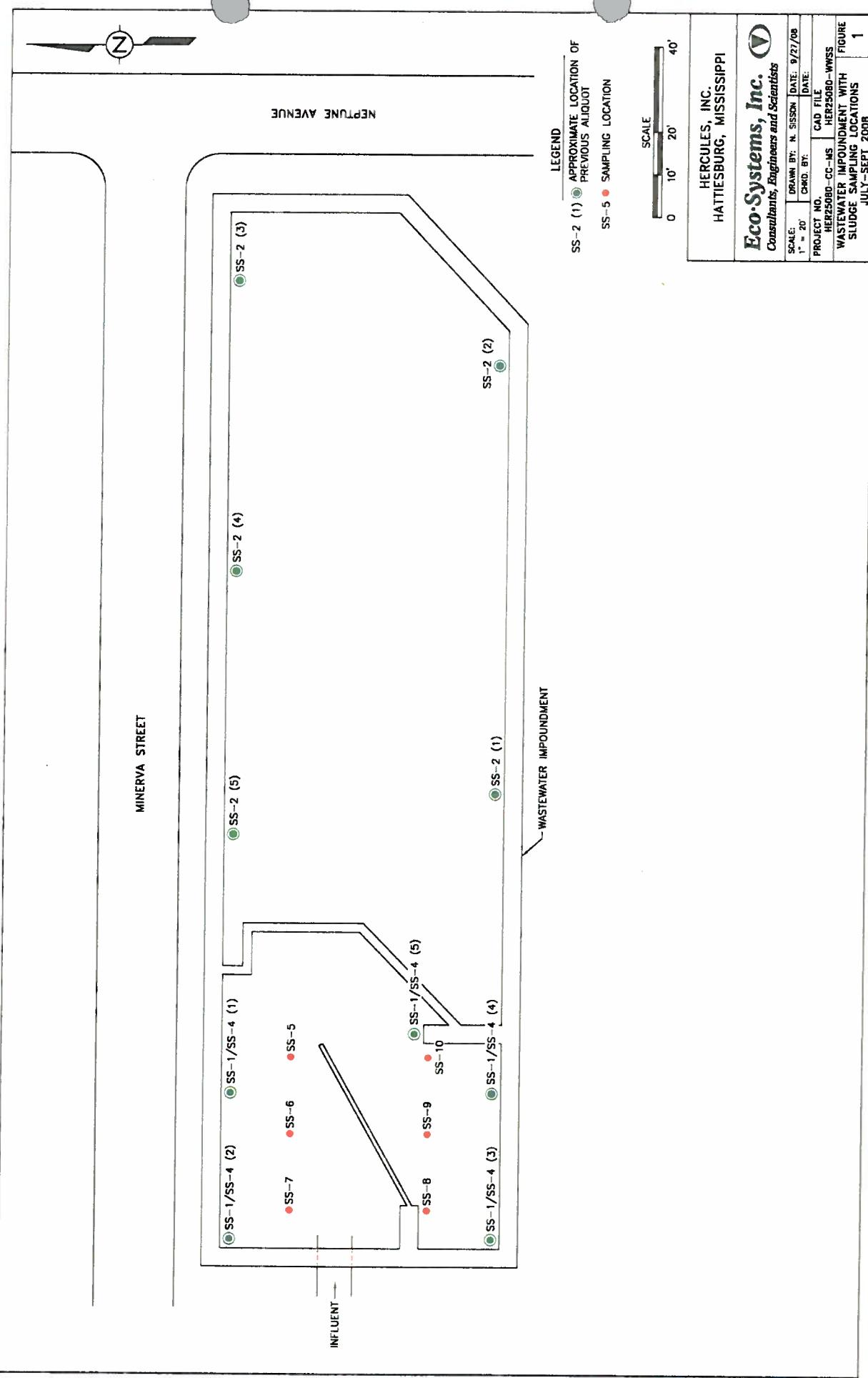
The final clean out may generate some localized odors. This may occur when the sludge is disturbed during the removal. We do not expect any odors to create any risk to the community. Any odor will most likely be a mercaptan or sulfur type odor. The human nose can detect these substances at very low levels - levels that are far below levels that might be harmful. We will utilize the latest technology-based techniques, such as the possibility of pH adjustment, and we will monitor any odors as the work progresses. We anticipate both starting and completing this work during the 3rd quarter of 2008.

If you have any questions, or we can provide any additional information, please contact Mr. Charles Jordan, our Environmental Professional, at 601-545-3360, or myself at 414-461-4000 ext. 157.

Sincerely,

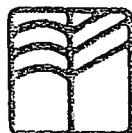
Rodney S. Bolton
Regional Manager





ATTACHMENT A

HISTORICAL ANALYTICAL RESULTS



August 08, 2001

1

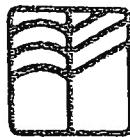
Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 7/27/01
Date Received: 7/30/01
Project #: Current Sludge Pit (7/01)
Client ID #: Current sludge pit
Laboratory ID #: 012875-01
Matrix: Solid
Extraction Method: I311
Date of Analysis: 8/7/01

TCLP Metals

<u>Parameter</u>	<u>Detection Limit</u> (mg/l)	<u>Results</u> (mg/l)	<u>Regulatory Level</u> (mg/l)
Arsenic	0.50	<0.5	5.0
Barium	1.0	<1.0	100.0
Cadmium	0.10	<0.1	1.0
Chromium	0.20	<0.2	5.0
Lead	0.50	<0.5	5.0
Mercury	0.0020	<0.002	0.20
Selenium	0.50	<0.5	1.0
Silver	0.50	<0.5	5.0

Laboratory Manager: Bassam Youssef



August 08, 2001

2

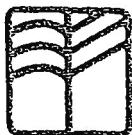
Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 7/27/01
Date Received: 7/30/01
Project #: Current Sludge Pit (7/01)
Client ID #: Current sludge pit
Laboratory ID #: 012875-01
Matrix: Solid
Extraction Method: 1311
Date of Analysis: 8/7/01

TCLP Volatiles

<u>Parameter</u>	<u>Detection Limit</u> (mg/L)	<u>Results</u> (mg/L)	<u>Regulatory Level</u> (mg/L)
1,1-Dichloroethene	0.10	<0.1	0.70
1,2-Dichloroethane	0.10	<0.1	0.50
2-Butanone (MEK)	2.0	<2.0	200.0
Benzene	0.10	<0.1	0.50
Carbon tetrachloride	0.10	<0.1	0.50
Chlorobenzene	0.10	<0.1	100.0
Chloroform	0.10	<0.1	6.0
Tetrachloroethene	0.10	<0.1	0.70
Trichloroethene	0.10	<0.1	0.50
Vinyl Chloride	0.20	<0.2	0.20

Laboratory Manager Bassam Youssef



August 08, 2001

3

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 7/27/01
Date Received: 7/30/01
Project #: Current Sludge Pit (7/01)
Client ID #: Current sludge pit
Laboratory ID #: 012875-01
Matrix: Solid
Extraction Method: 1311
Date of Analysis: 8/6/01

TCLP BNA

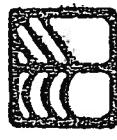
<u>Parameter</u>	<u>Detection Limit</u> (mg/l)	<u>Results</u> (mg/l)	<u>Regulatory Level</u> (mg/l)
1,4-Dichlorobenzene	0.10	<0.1	7.5
2,4,5-Trichlorophenol	0.25	<0.25	400.0
2,4,6--Trichlorophenol	0.25	<0.25	2.0
2,4-Dinitrotoluene	0.10	<0.1	0.13
Cresols	0.10	<0.1	200.0
Hexachloro-1,3-butadiene	0.10	<0.1	0.50
Hexachlorobenzene	0.10	<0.1	0.13
Hexachloroethane	0.10	<0.1	3.0
Nitrobenzene	0.10	<0.1	2.0
Pentachlorophenol	0.25	<0.25	100.0
Pyridine	0.25	<0.25	5.0

Laboratory Manager: Bassam Youssef

SUMMIT ENVIRONMENTAL TECHNOLOGIES, INC.
595 EAST TALLMADGE AVENUE
AKRON, OHIO 44310
TEL: 330/253-8211; FAX: 330/253-4489

CHAIN OF CUSTODY

A2LA CERTIFICATION #: 0724-01



S.E.T.

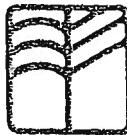
PROJECT NAME: Chestnut Ridge, 77th & 7th c1

PROJECT LOCATION

CLIENT NAME: Hannaford CLIENT ADDRESS: 601 3rd & 7th STREET

CONTACT PERSON: Christopher Jackson PHONE #: (216) 545-3454 FAX #: (216) 545-3455 SAMPLED BY: Christopher Jackson S.E.T.

#	SAMPLE ID#	MEDIA	TIME	DATE	BTEX	GRO	DRO	TPH	TCLP	TCLP	TCLP	OTHERS
					8015M	8015M	418.1	418.1	BNAS	VOCS	PEST/HERB	
1	<u>Current Sludge Pit</u>	SOLID	9:30AM	7-27-91					X	X	X	
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
27												
28												
29												
30												
31												
32												
33												
34												
35												
36												
37												
38												
39												
40												
41												
42												
43												
44												
45												
46												
47												
48												
49												
50												
51												
52												
53												
54												
55												
56												
57												
58												
59												
60												
61												
62												
63												
64												
65												
66												
67												
68												
69												
70												
71												
72												
73												
74												
75												
76												
77												
78												
79												
80												
81												
82												
83												
84												
85												
86												
87												
88												
89												
90												
91												
92												
93												
94												
95												
96												
97												
98												
99												
100												
101												
102												
103												
104												
105												
106												
107												
108												
109												
110												
111												
112												
113												
114												
115												
116												
117												
118												
119												
120												
121												
122												
123												
124												
125												
126												
127												
128												
129												
130												
131												
132												
133												
134												
135												
136												
137												
138												
139												
140												
141												
142												
143												
144												
145												
146												
147												
148												
149												
150												
151												
152												
153												
154												
155												
156												
157												
158												
159												
160												
161												
162												
163												
164												
165												
166												
167												
168												
169												
170												
171												
172												
173					</							



SUMMIT
ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

September 08, 2000

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: 1B Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Extraction Method: 1311
Date of Analysis: 9/5/00

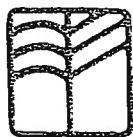
1

TCLP Metals

<u>Parameter</u>	<u>Detection Limit</u> (mg/l)	<u>Results</u> (mg/l)	<u>Regulatory Level</u> (mg/l)
Arsenic	0.010	<0.01	5.0
Barium	1.0	<1.0	100.0
Cadmium	0.0050	0.011	1.0
Chromium	0.050	<0.05	5.0
Lead	0.10	<0.1	5.0
Mercury	0.0020	<0.002	0.20
Selenium	0.020	<0.02	1.0
Silver	0.010	<0.01	5.0

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724.01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: set3746@apk.net



September 08, 2000

2

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

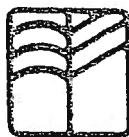
Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Extraction Method: 1311
Date of Analysis: 9/1/00

TCLP Volatiles

<u>Parameter</u>	<u>Detection Limit</u> (mg/L)	<u>Results</u> (mg/L)	<u>Regulatory Level</u> (mg/L)
1,1-Dichloroethene	0.10	<0.1	0.70
1,2-Dichloroethane	0.10	<0.1	0.50
2-Butanone (MEK)	2.0	<2.0	200.0
Benzene	0.10	<0.1	0.50
Carbon tetrachloride	0.10	<0.1	0.50
Chlorobenzene	0.10	<0.1	100.0
Chloroform	0.10	<0.1	6.0
Tetrachloroethene	0.10	<0.1	0.70
Trichloroethene	0.10	<0.1	0.50
Vinyl Chloride	0.20	<0.2	0.20

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724.01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: sei3746@apn.net



September 08, 2000

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Extraction Method: I311
Date of Analysis: 8/31/00

TCLP BNA

<u>Parameter</u>	<u>Detection Limit</u> (mg/l)	<u>Results</u> (mg/l)	<u>Regulatory Level</u> (mg/l)
1,4-Dichlorobenzene	0.10	<0.1	7.5
2,4,5-Trichlorophenol	0.25	<0.25	400.0
2,4,6-Trichlorophenol	0.25	<0.25	2.0
2,4-Dinitrotoluene	0.10	<0.1	0.13
Cresols	0.10	1.8	200.0
Hexachloro-1,3-butadiene	0.10	<0.1	0.50
Hexachlorobenzene	0.10	<0.1	0.13
Hexachloroethane	0.10	<0.1	3.0
Nitrobenzene	0.10	<0.1	2.0
Pentachlorophenol	0.25	<0.25	100.0
Pyridine	0.25	<0.25	5.0

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724-01 • ISO 9000
595 East Talmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: set3746@apk.net



September 08, 2000

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

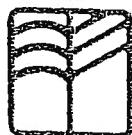
Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Extraction Method: 1311
Date of Analysis: 9/7/00

TCLP Herbicides

<u>Parameter</u>	<u>Detection Limit</u> (mg/l)	<u>Results</u> (mg/l)	<u>Regulatory Level</u> (mg/l)
2,4,5-TP(Silvex)	0.0050	<0.005	1.0
2,4,D	0.020	<0.02	10.0

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724.01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: sei3746@apk.net



September 08, 2000

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

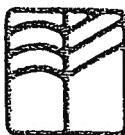
Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Extraction Method: 1311
Date of Analysis: 9/1/00

TCLP Pesticides

<u>Parameter</u>	<u>Detection Limit</u> <u>(mg/l)</u>	<u>Results</u> <u>(mg/l)</u>	<u>Regulatory Level</u> <u>(mg/l)</u>
Chlordane	0.010	<0.01	0.030
Endrin	0.0020	<0.002	0.020
Gamma-BHC	0.0020	<0.002	0.0020
Heptachlor	0.0020	<0.002	0.0080
Heptachlor Epoxide	0.0020	<0.002	0.0080
Methoxychlor	0.0020	<0.002	10.0
Toxaphene	0.10	<0.1	0.50

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724-01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: sel3746@apk.net



SUMMIT

ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

6

September 08, 2000

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Analyst: TRS

<u>Parameter</u>	<u>Method</u>	<u>Detection Limit (mg/l)</u>	<u>Results (mg/l)</u>	<u>Date of Analysis</u>
Reactive Cyanide	7.3.3.2	0.500	<0.50	8/31/00
Reactive Sulfide	7.3.4.2	25.000	150.000	9/1/00

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724.01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: sel3746@apk.net



SUMMIT

ENVIRONMENTAL TECHNOLOGIES, INC.
Analytical Laboratories

September 08, 2000

7

Client: Hercules
Address: 613 West 7th ST
Hattiesburg, MS 39401

Date Collected: 8/24/00
Date Received: 8/28/00
Project #: N/A
Client ID #: IB Sludge
Laboratory ID #: 003248-01
Matrix: Liquid
Analyst: BY

<u>Parameter</u>	<u>Method</u>	<u>Results</u>	<u>Date of Analysis</u>
Flash Point	1010	>140F	9/6/00
pH	EPA 150.1	5.01s.u.	9/3/00

Laboratory Manager: Bassam Youssef

"Analytical Integrity" • A2LA Accreditation #0724.01 • ISO 9000
595 East Tallmadge Avenue • Akron, Ohio 44310 • Phone: 330-253-8211 • Fax: 330-253-4489
Email: sel3746@apk.net

SUMMIT ENVIRONMENTAL TECHNOLOGIES, INC.
595 EAST TALLMADGE AVENUE
AKRON, OHIO 44310
TEL: 330/253-8211; FAX: 330/253-4489

CHAIN OF CUSTODY



A2LA CERTIFICATION #: 0724-01
S.E.T.

PROJECT NAME:

Hercules Client Address: 613 West 7th St. Hattiesburg, MS 39401
Client Name: Sor Gary
Contact Person: Charlie
Phone # 584-3360. FAX #: 584-3360

PROJECT LOCATION:

PO#:

<

BONNER ANALYTICAL TESTING COMPANY

2703 OAK GROVE ROAD
HATTIESBURG, MS 39402
Ph. (601) 264-2854

Client: HERCULES

File Number: BT45075
Collected By: CMC

Sample Date/Time: 05-13-98 @ 1345
Date/Time Rec'd: 05-13-98 @ 1500

TCLP EVALUATION - SLUDGE PIT COMPOSITE

Analyte/Method #	Result	MDL	Date/Time/Analyst
LEACHABLE METALS:			
Arsenic/6010	ND	0.02	05-26-98/1804/GMR
Barium/6010	0.22	0.002	06-01-98/1553/GMR
Cadmium/7130	ND	0.02	05-27-98/1437/SLH
Chromium/7190	ND	0.04	05-21-98/1330/SLH
Lead/6010	ND	0.02	05-21-98/1155/SLH
Mercury/7470	ND	0.001	05-20-98/1546/SLH
Selenium/6010	ND	0.03	06-04-98/1137/SLH
Silver/7760	ND	0.05	05-26-98/1321/SLH
pH, S.U./9045	3.42	<u>+0.01</u>	06-01-98/1142/JDS
REACTIVITY			
Cyanides (mg/kg)/9010	0.04	0.01	06-01-98/1111/JDS
Sulfides (mg/kg)/9030	ND	1	06-01-98/1115/JDS
Ignitability °F/1010	144	<u>+1</u>	06-01-98/1335/JDS

Data reported in mg/L unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:


Michael S. Bonner, Ph.D.

BONNER ANALYTICAL TESTING COMPANY

sr

BONNER ANALYTICAL TESTING COMPANY

2703 OAK GROVE ROAD
HATTIESBURG, MS 39402
PH. (601) 264-2854

Client: HERCULES

File Number: BT45075
Collected By: Client

Sample Date/Time: 05-13-98 @ 1345
Date/Time Rec'd: 05-13-98 @ 1500

QA/QC RESULTS

Analyte	Method Blank	Spike Amount	Matrix Spike Recovery %	Matrix Spike Duplicate Recovery %	RPD%
Arsenic	ND	1.0	85.9	92.3	6.38
Barium	ND	0.50	100	98.9	1.1
Cadmium	ND	0.50	96.4	100.4	4
Chromium	ND	0.50	99.0	104	5
Lead	ND	1.0	110.3	100.7	10.11
Mercury	ND	0.003	102	100	1.98
Selenium	ND	2.0	104.1	96.5	7.61
Silver	ND	2.5	96.9	95.9	0.99

All analyses performed in accordance with 40 CFR 136 and amendments.

Certified by:


Michael S. Bonner, Ph.D.

BONNER ANALYTICAL TESTING COMPANY

sr

BONNER ANALYTICAL TESTING COMPANY
QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
VOLATILES - TCLP - GC/MS ANALYSIS DATA

TCLP Compound Name	MDL mg/L (ppm)	Regulatory Level (ppm)	SAMPLE Spike			BLANK Spike			MATRIX Spike			MATRIX DUPLICATE Spike		
			Detected Amount	Amount	% Recovery	Detected Amount	Amount	% Recovery	Detected Amount	Amount	% Recovery	Detected Amount	Amount	% Recovery
D029 1,1-Dichloroethene	0.002	0.7	ND	ND		ND	ND		46.4	250.0	92.8	45.4	250.0	90.8
D018 Benzene	0.002	0.5	ND	ND		ND	ND		47.1	250.0	94.2	48.4	250.0	96.8
D040 Trichloroethene	0.003	0.5	ND	ND		ND	ND		51.4	250.0	102.8	50.3	250.0	100.5
D021 Chlorobenzene	0.002	100.0	ND	ND		ND	ND		50.7	250.0	101.4	54.0	250.0	108.0
D043 Vinyl Chloride	0.003	0.2	ND	ND		ND	ND		40.5	250.0	81.0	37.3	250.0	74.6
D035 2-Butanone (MEK)	0.01	200.0	0.012	6.0		ND	ND		66.0	250.0	132.0	65.0	250.0	130.0
D022 Chloroform	0.002	6.0	ND	ND		ND	ND		45.5	250.0	91.0	47.2	250.0	94.4
D019 Carbon Tetrachloride	0.002	0.5	ND	ND		ND	ND		46.8	250.0	93.6	46.5	250.0	93.0
D028 1,2-Dichloroethane	0.002	0.5	ND	ND		ND	ND		52.0	250.0	104.0	53.5	250.0	107.0
D039 Tetraethylorthocarbonate	0.002	0.7	ND	ND		ND	ND		51.1	250.0	102.2	48.4	250.0	96.8
Surrogate Compounds			Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery
Dibromofluoromethane	48.1	250.0	96.2	50.0	100.0	47.6	250.0	95.2	50.8	250.0	101.6	250.0	103.4	
Toluene-d8	46.9	250.0	93.8	48.0	96.0	51.0	250.0	102.0	51.7	250.0	97.4	250.0	98.7	
4-Bromofluorobenzene	47.4	250.0	94.8	44.8	99.6	44.4	250.0	88.8	48.7	250.0				

Certified by:

Michael S. Bonner Ph. D.
 Bonner Analytical Testing Company



BONNER ANALYTICAL TESTING COMPANY
QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
BASE NEUTRALS AND ACIDS - GC/MS ANALYSIS DATA

Client: Hercules
 Location: TCLP
 File #: BT45075

Compound Name	CAS Number	MDL mg/L (ppm)	SAMPLE		BLANK		MATRIX		Matrix Duplicate Spikes		
			Detected Amount mg/L (ppm)	Spike ug	Regulatory Level Amount mg/L (ppm)	Amount ug	% Recovery	Detected Amount ng/L (ppt) in the extract	Amount ug	% Recovery	Detected Amount ng/L in the extract
D038 Pyridine	110-86-1	0.0025	ND	5.00	ND	5.00	100.00	54.98	26.00	22.77	25.00
D027 1,4-Dichlorobenzene	106-46-7	0.0061	ND	7.50	ND	200.00	200.00	26.64	17.76	150.00	55.48
D023 2-Methylphenol	95-48-7	0.0056	ND	ND	200.00	ND	ND	27.51	150.00	150.00	18.39
D025 3,4-Methylphenol	106-44-5	0.0174	ND	ND	3.00	ND	ND	33.45	100.00	18.34	18.71
D034 Hexachloroethane	67-72-1	0.0080	ND	ND	2.00	ND	ND	48.88	100.00	33.45	35.31
D036 Nitrobenzene	98-95-3	0.0082	ND	0.50	ND	ND	ND	34.31	100.00	50.21	50.21
D033 Hexachlorbutadiene	87-68-3	0.0094	ND	2.00	ND	40.00	40.00	46.68	150.00	31.12	36.09
D042 2,4,6-Trichlorophenol	88-06-2	0.0091	ND	ND	ND	ND	ND	48.12	150.00	49.80	150.00
D041 2,4,5-Trichlorophenol	95-95-4	0.0071	ND	0.13	ND	0.13	ND	88.37	100.00	87.81	100.00
D030 2,4-Dinitrotoluene	121-14-2	0.0083	ND	ND	ND	ND	ND	40.93	100.00	39.08	100.00
D032 Hexachlorobenzene	118-74-1	0.0080	ND	ND	ND	ND	ND	147.87	150.00	98.58	150.00
D037 Pentachlorophenol	87-86-5	0.0125	ND	100.00	ND	ND	ND	129.90	150.00	86.60	150.00
Surrogate Compounds											
2-Fluorophenol		65.64	200.00	32.82	154.88	200.00	77.34	40.64	200.00	20.32	35.46
Phenol-d6		41.56	200.00	20.78	155.97	200.00	77.99	23.30	200.00	11.65	22.42
Nitrobenzene-d5		73.10	100.00	73.10	65.70	100.00	65.70	38.38	100.00	53.04	36.12
2-Fluorobiphenyl		97.76	100.00	97.76	85.57	100.00	85.57	53.04	100.00	46.98	100.00
2,4,6-Tribromophenol		193.52	200.00	96.76	184.12	200.00	92.06	148.62	200.00	74.31	133.58
Terphenyl-d14		116.10	100.00	116.10	136.08	100.00	136.06	58.80	100.00	52.96	100.00

• Results Outside of QA Limits

Certified by:

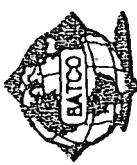
Michael S. Bonner, Ph. D.
 Banner Analytical Testing Company

BONNER ANALYTICAL TESTING COMPANY
 QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
 PESTICIDE / HERBICIDE - ECD ANALYSIS DATA

METHOD BLANK										MATRIX SPIKE				MATRIX SPIKE DUPLICATE			
EPA HW No.	COMPOUNDS	Regulatory Level ug/L (ppb)	SAMPLE			Spike			Detected			Spike			Detected		
			MDL ug/L (ppb)	Detected Amount ug	% Recovery	Amount ug	% Recovery	ug/L (ppb)	Amount ug	% Recovery	ug/L (ppb)	Amount ug	% Recovery	ug/L (ppb)	Amount ug	% Recovery	
D012	Pesticides	20.00	0.10	ND		ND		ND	159.2	200	79.60	170.2	200	85.10			
D013	Endrin *	400	0.05	ND		ND		ND	144.9	200	72.45	149.9	200	74.95			
D014	Gamma-BHC *	10000	0.50	ND		ND		ND	180.7	200	90.35	194.4	200	97.20			
D015	Heptachlor *	500	1.00	ND		ND		ND	140.9	200	70.45	164.5	200	82.25			
D020	Toxaphene	30.00	0.50	ND		ND		ND	165.3	200	82.65	155.9	200	77.95			
D031	Chlordane	8.00	0.05	ND		ND		ND	310.4	400	77.60	353.9	400	88.48			
D031	Heptachlor Epoxide *	8.00	0.10	ND		ND		ND	334.8	400	83.70	324.1	400	81.03			
D016	Herbicides	10000	0.60	ND		ND		ND									
D017	2,4-D *	1000	0.50	ND		ND		ND									
SURROGATE COMPOUNDS			Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery	Detected Amount	Spiked Amount	% Recovery
Decachlorobiphenyl			16.08	20.00	80.40	16.40	20.00	82.00	15.60	20.00	78.00	18.13	20.00	90.65			
2,4-Dichlorophenylacetic acid			34.66	40.00	86.65	35.76	40.00	89.40	36.84	40.00	92.10	38.89	40.00	97.23			

* Matrix Spiking Compounds

Michael S. Bonner
 Michael S. Bonner, Ph.D.
 BONNER ANALYTICAL TESTING COMPANY



BONNER ANALYTICAL TESTING COMPANY

YOUR COMPANY NAME - Hedinger
OUR COMPANY ADDRESS: 707 Hines Street, M.S.
NAME OF PERSON TO CONTACT Randy Horvath, Raymond Horvath

Phone: 2703 Oak Grove Road Fax:
(601) 264-2854 Hattiesburg, MS 39402 (601) 268-7084
"Testing Your World for a Safer Tomorrow"

NAME OF PERSON TO CONTACT Brendy Horvath, Raymond Park		YOUR PROJECT NAME: Ski Lodge Project		MATRIX	
CONTACT PERSON'S PHONE					
YOUR PROJECT NO.	YOUR PO #			DATE	TIME
		YOUR SAMPLE DESCRIPTION: Ski Lodge Project			

BONNER ANALYTICAL TESTING COMPANY

2703 OAK GROVE ROAD
HATTIESBURG, MS 39402
Ph. (601) 264-2854

Client: HERCULES, INC.

File Number: BT34003
Collected By: Client

Sample Date/Time: 08-28-96
Date/Time Rec'd: 08-28-96 @ 1600

TCLP EVALUATION--IMPOUNDMENT BASIN SLUDGE

Analyte/Method #	Result	MDL	Date/Time/Analyst
------------------	--------	-----	-------------------

LEACHABLE METALS:

Arsenic/6010	ND	0.02	09-06-96/1255/JMD
Barium/6010	0.425	0.002	09-06-96/1255/JMD
Cadmium/7130	ND	0.02	09-05-96/1545/JMD
Chromium/7190	ND	0.04	09-06-96/0900/JMD
Lead/7420	ND	0.15	09-06-96/0920/JMD
Mercury/7470	ND	0.001	09-06-96/1530/JMD
Selenium/6010	ND	0.03	09-06-96/1255/JMD
Silver/7760	ND	0.05	09-05-96/1540/JMD
pH, s.u./9045	5.95	<u>+0.01</u>	09-24-96/1645/RML

REACTIVITY:

Cyanide (mg/kg)/9010	0.02	0.02	10-03-96/1000/TEB
Sulfide (mg/kg)/9030	64	1	09-23-96/1400/RML
Ignitability °F/1020	>180	<u>+0.5</u>	09-18-96/1045/RML

Data reported in mg/L, unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:


Michael S. Bonner, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

lr

BONNER ANALYTICAL TESTING COMPANY

2703 OAK GROVE ROAD
HATTIESBURG, MS 39402
Ph. (601) 264-2854

Client: HERCULES, INC.

File Number: BT34003 Sample Date/Time: 08-28-96
Collected By: Client Date/Time Rec'd: 08-28-96 @ 1600

TCLP EVALUATION--IMPOUNDMENT BASIN SLUDGE

Analyte/Method #	Result	MDL	Date/Time/Analyst
Total Solids/---	11.64	0.1	09-23-96/1430/RWC
TKN/351.3	1,350	14	09-10-96/1130/KAW
Ammonia/350.2	180	14	09-19-96/1130/KAW
Phosphorus/365.2	170	0.1	09-18-96/1000/RML
Potassium/6010	32.2	0.6	09-18-96/0825/JMD

Data reported in mg/L, unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:



Michael S. Bonney, Ph.D.

BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
BASE NEUTRALS AND ACIDS - GC/MS ANALYSIS DATA

Compound	EPA HW NO.	BT34003	Hercules COMPANY	TCLP SAMPLE TYPE	SAMPLE	REGULATORY LEVEL			BLANK			DUPLICATE MATRIX							
						MDL mg/L (ppm)	Detected Concen. mg/L (ppm)	Spike Amt. ug	Concen. mg/L (ppm)	Detected Concen. mg/L (ppm)	Spike Amt. ug	Concen. % Recov	Detected Concen. ng/uL (ppm)	Spike Amt. ug	Concen. % Recov				
D038 Pyridine*						.020	ND		5.0	ND	70.0	100	70.0	65.6	100	65.6			
D027 1,4-Dichlorobenzene*						.020	ND		7.5	ND	86.9	100	86.9	76.1	100	76.1			
D023 2-Methylphenol*						.020	0.328		200.0	ND	131.4	150	136.5	130.3	150	86.9			
D024 3-Methylphenol*						.020	0.506		200.0	ND	140.1	150	88.2	128.6	150	91.0			
D025 4-Methylphenol*						.020	0.478		200.0	ND	132.3	150	79.4	100	100	85.7			
D034 Hexachlorobutane*						.020	ND		3.0	ND	80.0	100	80.0	76.4	100	81.0			
D036 Nitrobenzene*						.020	ND		2.0	ND	92.8	100	92.8	82.9	100	82.9			
D033 Hexachlorobutadiene*						.020	ND		0.5	ND	135.6	150	90.4	133.6	150	89.1			
D042 2,4,6-Trichloropheno*						.020	ND		400.0	ND	139.1	150	78.1	138.2	150	92.1			
D041 2,4,5-Trichloropheno*						.100	ND		0.13	ND	78.1	100	79.6	79.6	100	79.6			
D030 2,4-Dinitrotoluene*						.020	ND		0.13	ND	94.3	100	94.3	82.4	100	82.4			
D032 Hexachlorobenzene*						.020	ND		0.13	ND	93.9	100	93.9	141.1	150	94.1			
D037 Pentachloropheno*						.100	ND		100.0	ND	140.8	150							
SURROGATES:																			
Fluoropheno										152.6	200	76.3	100.8	200	50.4	97.8	200	48.9	
Phenol-d6										198.9	200	49.5	71.1	200	35.6	69.3	200	34.6	
Nitrobenzene-d5										85.2	100	84.7	84.7	100	73.7	100	73.7		
Fluorobiphenyl										81.7	100	81.7	97.8	100	83.9	100	83.9		
2,4,6-Tribromopheno										201.1	200	100.6	172.4	200	86.2	159.4	200	79.7	
Terphenyl-d4										100.3	100	100.3	78.5	100	73.4	73.4	100	73.4	

* MATRIX SPIKING COMPOUNDS

Certified by: *John S. Bonner*
MICHAEL S. BONNER, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY
 QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
 VOLATILES - GC/MS ANALYSIS DATA

Compound EPA HW No.	NOL (ppm)	SAMPLE			BLANK			REGULATORY LEVEL			MATRIX (BT34002)			DUPLICATE MATRIX (BT34002)		
		Detected Concen. mg/L (ppm)	Spike Concen. mg/L (ppm)	% Recov												
D029 1,1-Dichloroethene	0.05	ND	0.012	J	ND	ND	ND	0.5	0.5	101.2	0.051	250	105.0	0.053	250	103.0
D018 Benzene	0.05	ND	0.05	ND	ND	ND	ND	0.5	0.5	104.8	0.052	250	103.4	0.054	250	107.4
D040 Trichloroethene	0.05	ND	0.05	ND	ND	ND	ND	100.0	0.056	112.4	0.061	250	112.4	0.057	250	114.0
D021 Chlorobenzene	0.05	ND	0.1	ND	ND	ND	ND	0.2	0.167	122.4	0.167	250	127.4	0.195	250	102.6
D043 Vinyl Chloride	0.1	ND	0.436	0.1	ND	ND	ND	200.0	0.052	103.6	0.054	250	103.6	0.056	250	162.8
D035 2-Butanone (MEK)	0.1	ND	0.036	0.1	ND	ND	ND	6.0	0.5	107.6	0.054	250	107.6	0.054	250	112.6
D022 Chloroform	0.05	ND	0.05	ND	ND	ND	ND	0.5	0.5	99.4	0.050	250	99.4	0.050	250	99.6
D019 Carbon Tetrachloride	0.05	ND	0.05	ND	ND	ND	ND	0.7	0.5	112.6	0.056	250	112.6	0.060	250	120.8
D028 1,2-Dichloroethane	0.05	ND	0.05	ND	ND	ND	ND									
D039 Tetrachloroethene	0.05	ND	0.05	ND	ND	ND	ND									
Surrogates:								$\mu\text{g/L}$ (ppb)			$\mu\text{g/L}$ (ppb)			$\mu\text{g/L}$ (ppb)		
Dibromo Fluoromethane	48.7	250	97.4	51.0	250	102.0	102.0	49.2	250	98.4	51.4	250	102.8	50.1	250	102.5
Toluene-d8	50.7	250	101.4	51.9	250	103.8	103.8	50.3	250	100.2	48.3	250	96.6	48.3	250	96.5
4-Bromo Fluorobenzene	55.6	250	111.2	48.0	250	96.0	96.0	51.7	250	96.6	51.7	250	103.4	51.7	250	103.4

J = results estimated or Below Method Detection Level.

M. Bonner
 Certified by: MICHAEL S. BONNER, P.E.
 BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
PESTICIDE/POLYCHLORINATED BIPHENYL - ECD ANALYSIS DATA

Chain of Custody Data Required for BATCO Data Management Summary Reports

Analysis Method - SH-B46-8080
 Sediment Sludge
 Baseline
 SAMPLE POINT

Compound	BATCO File #	Hercules COMPANY	TCLP SAMPLE TYPE	SAMPLE			BLANK			MATRIX			DUPLICATE MATRIX		
				ND ug/L (ppb)	Detected Concen. ug/L (ppb)	Spike Amt. ug									
* Gamma-BHC (Lindane)				0.05	ND		ND		7.74	12.5	61.9	7.49	12.5	59.9	
* Heptachlor				0.05	ND		ND		6.35	12.5	50.8	6.62	12.5	53.0	
* Endrin				0.10	ND		ND		13.21	25.0	52.8	13.53	25.0	54.1	
* Heptachlor epoxide				0.05	ND		ND		9.63	12.5	77.0	9.00	12.5	72.0	
* Methoxychlor				0.50	ND		ND		1.29	2.0	64.5	1.61	2.0	80.5	
Toxaphene				1.00	ND		ND		1.57	2.0	78.5	0.91	2.0	45.5	
Chlordane				0.50	ND		ND								
+ 2,4-D				0.50	ND		ND								
+ 2,4,5-TP (Silvex)				0.50	ND		ND								
Surrogate:															
Tetrachloro-m-Xylene				0.182	0.20	91.0	0.075	0.20	37.5	0.100	50.0	0.064	0.20	32.0	
Decachlorobiphenyl				0.116	0.20	58.0	0.059	0.20	29.5	0.111	55.5	0.107	0.20	53.5	
Oichlorophenylacetic acid				1.604	2.00	80.2	2.200	2.00	110.0	1.160	55.0	0.951	2.00	47.6	

Extracted 09/03/96
 Herbicide analyzed on 09/26/96 00734
 *Matrix Spiking Compounds

Certified by: *[Signature]*
 MICHAEL ST. BONNER, PH.D.
 BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

Phone: 2703 Oak Grove Road Fax:

Hattiesburg, MS 39402 (601) 268-7084

YOUR COMPANY NAME: Hercules
YOUR COMPANY ADDRESS:
NAME OF PERSON TO CONTACT: Chuckie Donelan
CONTACT PERSON'S PHONE:

(601) 264-2854 *Testing Your World for a Safer Tomorrow*



PARAMETERS FOR ANALYSIS

REMARKS

Turnaround Time

TESTING METHODS	NUMBER OF CONTAINERS	PRESERVATIONS	Detection Limits	
			Special Limits Require	Yes No
TCLP	X	X		
TCLP-UCA	X	X		
Ru: B1A	X	X		
TCLP-DOMESTIC	X	X		
TCLP-INTERNATIONAL	X	X		
PC, TCI	X	X		

BT3403

(MURKED MURKY RAIN SLUDGE)

BT3403

6		YOUR PROJECT NO.: YOUR PO.#			YOUR PROJECT NAME:		
7		YOUR SAMPLE DESCRIPTION:			DATE TIME MATRIX		
8		SAMPLE IN COOKING 1-gallon CONTAINER			RELINQUISHED BY: DATE TIME RECEIVED BY: (Signature)		
9		MUST BE FRESHEN			RELINQUISHED BY: DATE TIME RECEIVED BY: (Signature)		
10		RELINQUISHED BY: DATE TIME RECEIVED BY: (Signature)			RELINQUISHED BY: DATE TIME RECEIVED BY: (Signature)		
11		METHOD OF SHIPMENT COURIER SHIPPED BY: (Signature)			RECEIVED FOR BATCO BY: (Signature)		
12		SAMPLE REMAINDER DISPOSAL RETURN SAMPLE REMAINDER TO CLIENT VIA _____ *ME SHIPPING CHARGES MAY BE INCURRED)			DATE/TIM: 8-28-1602 REVISION DATE:		
13		I REQUEST BATCO TO DISPOSE OF ALL SAMPLE REMAINDERS (Signature) (Date)					

SAMPLE REMAINDER DISPOSAL
RETURN SAMPLE REMAINDER TO CLIENT VIA _____
*ME SHIPPING CHARGES MAY BE INCURRED)

IF SAMPLE REMAINDER IS DETERMINED TO BE HAZARDOUS, A MINIMUM ADDITIONAL CHARGE OF \$25.00 PER SAMPLE WILL BE ASSESSED FOR DISPOSAL.

From: Environmental Diagnostic Laboratories
P.O. Box 15098
Hattiesburg, MS 39404-5098
(800) 606-7363 or (601) 264-2222

LK 3766

From Leo

March 13, 1996

To: Mr. Charles Jordan
Hercules, Inc.
P.O. Box 1937
Hattiesburg, MS 39403

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

Sample I.D. AA13228 Location Code: HERCULES
Sample Description: I.B Sludge Sample collector: J HUSBANDS
Sample collection date: 03/05/96 Time: 11:30
Lab submittal date: 03/05/96 Time: 16:21
Received by: JPH Validated by: JPH

Parameter: TCLP Extraction (Leach)
Method reference: SW846-1311
Result: Completed
Date started: 03/06/96
Time started: 16:00
MDL or sensitivity:
Date finished: 03/07/96
Analyst: JFL

Parameter: TCLP Extraction for volatiles
Method reference: SW846-1311
Result: Completed
Date started: 03/06/96
Time started: 16:00
MDL or sensitivity:
Date finished: 03/07/96
Analyst: JFL

Parameter: Acid Digestion
Method reference: SW846-3010
Result: Completed
Date started: 03/11/96
Time started: 08:45
MDL or sensitivity:
Date finished: 03/11/96
Analyst: HPG

Parameter: Mercury water digestion
Method reference: SW846-7470
Result: Completed
Date started: 03/11/96
Time started: 09:45
MDL or sensitivity:
Date finished: 03/11/96
Analyst: HPG

Parameter: TCLP Metals
Method reference: EPA 200's
Result: see below
Date started: 03/11/96
Time started: 13:15
Date finished: 03/11/96
Analyst: HPG

Mr. Charles Jordan Sample I.D. AA13228 (continued)
Page: 2
March 13, 1996

Parameter: TCLP Volatiles
Method reference: SW846-8240
Result: see below
Date started: 03/06/96
Time started: 12:34

Date finished: 03/06/96
Analyst: DCB

Parameter: TCLP Semivolatiles
Method reference: SW846-8270
Result: see below
Date started: 03/07/96
Time started: 14:44

Date finished: 03/07/96
Analyst: WHD

Parameter: BNA Extraction on TCLP Fluid
Method reference: SW846-3510
Result: Completed
Date started: 03/07/96
Time started: 11:45

MDL or sensitivity:
Date finished: 03/07/96
Analyst: RWL

Parameter: % Solids
Method reference: EPA 160-3m
Result: 14.2 %
Date started: 03/06/96
Time started: 09:08

MDL or sensitivity: 1
Date finished: 03/12/96
Analyst: DLV

Parameter: Reactive Cyanide
Method reference: SW846
Result: Not detected mg release/Kg
Date started: 03/06/96
Time started: 08:20

MDL or sensitivity: 10
Date finished: 03/06/96
Analyst: DLV

Parameter: Reactive Sulfide
Method reference: SW846
Result: Less than mg release/Kg
Date started: 03/06/96
Time started: 08:20

MDL or sensitivity: 10
Date finished: 03/06/96
Analyst: DLV

Parameter: Corrosivity (pH)
Method reference: SW846
Result: 5.48 SU
Date started: 03/06/96
Time started: 08:53

MDL or sensitivity: 0.05
Date finished: 03/06/96
Analyst: DLV

Parameter: Ignitability
Method reference: SW846-1010
Result: > 160 deg F
Date started: 03/06/96
Time started: 09:30

MDL or sensitivity: 70
Date finished: 03/06/96
Analyst: DLV

Data for TCLP Metals mg/L:

Component Name	Result	Component MDL
Arsenic	Not detected	0.01
Barium	0.378	0.001

Mr. Charles Jordan Sample I.D. AA13228 (continued)
Page: 3
March 13, 1996

Data for TCLP Metals (continued):

Component Name	Result	Component MDL
Cadmium	Not detected	0.05
Chromium	0.015	0.001
Lead	0.027	0.01
Mercury	Not detected	0.001
Selenium	Not detected	0.01
Silver	0.007	0.001

Data for TCLP Volatiles ug/L:

Component Name	Result	Component MDL
Benzene	95.1	75
Carbon Tetrachloride	Not detected	75
Chlorobenzene	(39.0)	75
Chloroform	Not detected	75
1,2-Dichloroethane	Not detected	75
1,1-Dichloroethene	Not detected	75
2-Butanone	(442)	750
Tetrachloroethene	Not detected	75
Trichloroethene	Not detected	75
Vinyl Chloride	Not detected	150
1,2-Dichloroethane-d4 (surr) % Recovery	103	
Toluene-d8 (surr) % Recovery	105	
4-Bromofluorobenzene (surr) % Recovery	88	

Data for TCLP Semivolatiles ug/L:

Component Name	Result	Component MDL
2-Methylphenol (o-Cresol)	160	100
3- & 4-Methylphenol (m- & p-Cresol), total	280	100
1,4-Dichlorobenzene	Not detected	100
2,4-Dinitrotoluene	Not detected	100
Hexachlorobenzene	Not detected	100
Hexachlorobutadiene	Not detected	100
Hexachloroethane	Not detected	100
Nitrobenzene	Not detected	100
Pentachlorophenol	Not detected	500
Pyridine	Not detected	200
2,4,5-Trichlorophenol	Not detected	500
2,4,6-Trichlorophenol	Not detected	500
2-Fluorophenol (surr) % Recovery	64	
Phenol-d5 (surr) % Recovery	42	
2-Chlorophenol-d4 (surr) % Recovery	76	
1,2-Dichlorobenzene (surr) % Recovery	80	
Nitrobenzene-d5 (surr) % Recovery	46	
2-Fluorobiphenyl (surr) % Recovery	86	
2,4,6-Tribromophenol (surr) % Recovery	95	
Terphenyl-d14 (surr) % Recovery	93	

Mr. Charles Jordan Sample I.D. AA13228 (continued)
Page: 4
March 13, 1996

Sample comments:

Reference Lab Report No. R3766.

Quality Control/Quality Assurance Comments are included on an attached sheet.

If there are any questions regarding this data, please call.

Reviewed by: J. Paul Hollomon, Ph.D.
Laboratory Manager

Original Results To: Charles Jordan
Copy To: Leo Henwood

**Environmental Diagnostic
Laboratories, Inc.**



39 King Road • Hattiesburg, MS 39402
P.O. Box 15098
Office: 601-264-2222 • FAX: 601-268-2030

CHAIN OF CUSTODY RECORD

PROJ NO.	Project Name <i>of sleek</i>
Samplers: (signature) <i>T. Husband John Husband</i>	

236-16-96 MON 2:49 PM

EC: 2332030

26

07-12-1995 01:18PM FROM BONNER ANALYTICAL TESTING TO

5343226 P.02

BONNER ANALYTICAL TESTING COMPANY
2703 Oak Grove Road
Hattiesburg, MS 39402
(601) 264-2854

Client: HERCULES

File Number: BT26020
Collected By: Client

Sample Date/Time: 05-10-95 @ 0800
Date/Time Rec'd: 05-10-95 @ 0910

Corrected Copy

TCLP EVALUATION

Analyte/Method #	Location	MDL	Date/Time/Analyst
	Southwest Sludge Pit		
<hr/>			
LEACHABLE METALS:			
Arsenic/6010	ND	0.02	05-24-95/0910/DE
Barium/6010	0.211	0.003	05-24-95/0910/DE
Cadmium/7130	ND	0.03	05-15-95/1145/DE
Chromium/7190	ND	0.04	05-15-95/1450/DE
Lead/7420	ND	0.15	05-15-95/1350/DE
Mercury/7470	ND	0.001	05-24-95/1132/DE
Selenium/6010	ND	0.03	05-24-95/0910/DE
Silver/7760	ND	0.05	05-15-95/1310/DE
pH S.U./9045	5.18	±0.01	05-15-95/1155/JMD
<hr/>			
Reactivity			
Cyanides (mg/kg)/9010	ND	0.02	06-01-95/1320/JMD
Sulfides (mg/kg)/9030	25	1	05-10-95/1600/JMD
Ignitability °F/1010	>200	±1	06-22-95/1700/RWC
<hr/>			

Data reported in mg/L, unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:

Michael S. Bonner, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

07-12-1995 01:19PM FROM BONNER ANALYTICAL TESTING TO

5B43226 P.03

BONNER ANALYTICAL TESTING COMPANY
2703 Oak Grove Road
Hattiesburg, MS 39402
(601) 264-2854

7/21/95
139178
COC'data
to S. Jordan

Client: HERCULES

File Number: BT26020
Collected By: Client

Sample Date/Time: 05-10-95 @ 0800
Date/Time Rec'd: 05-10-95 @ 0910

TCLP EVALUATION

Analyte/Method #	Southwest Sludge Pit	MDL	Date/Time/Analyst
<hr/>			
LEACHABLE METALS:			
Arsenic/6010	ND	0.02	05-24-95/0910/DH
Barium/6010	0.211	0.003	05-24-95/0910/DH
Cadmium/7130	ND	0.03	05-15-95/1145/DH
Chromium/7190	ND	0.04	05-15-95/1450/DH
Lead/7420	ND	0.15	05-15-95/1350/DH
Mercury/7470	ND	0.001	05-24-95/1132/DH
Selenium/6010	ND	0.03	05-24-95/0910/DH
Silver/7760	ND	0.05	05-15-95/1310/DH
pH S.U./9045	5.18	±0.01	05-15-95/1155/JMD
Reactivity			
Cyanides (mg/kg)/9010	ND	0.02	06-01-95/1320/JMD
Sulfides (mg/kg)/9030	25	1	05-10-95/1600/JMD
Ignitability °F/1010	≤120	±1	05-10-95/1535/JMD
<hr/>			

Data reported in mg/L, unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:

Redray W. Culpine

Michael S. Bonner, Ph.D.

BONNER ANALYTICAL TESTING COMPANY

sr

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
BASE NEUTRALS AND ACIDS - GC/MS ANALYSIS DATA

Chain of Custody Data Required for BATCO Data Management System Method - SW-846 Method 8270
Extraction Method - EPA 1311 Analysis Method - GC/MS Sample from back forty
sample point Analyzed: 051095 @ 0800
Collected: 051095 @ 1305
Analyzed: 051895 DATE TIME

Compound	EPA HW No.	SAMPLE		REGULATORY LEVEL		BLANK		MATRIX		DUPLICATE MATRIX	
		PEDC ng/L (ppm)	Detected Concen. mg/L (ppm)	Spike Amt. ug	% Recov	Detected Concen. ng/L (ppm)	Spike Amt. ug	Detected Concen. ng/L (ppm)	Spike Amt. ug	Detected Concen. ng/L (ppm)	Spike Amt. ug
D038 Pyridine	.010	ND	ND			ND		66.8	100	66.8	100
D027 1,4-Dichlorobenzene*	.010	ND	ND			ND		83.0	100	79.1	100
D023 2-Methylphenol*	.010	0.208	0.208			ND		145.8	150	97.2	121.0
D024 3-Methylphenol*	.010	0.126	0.126			ND		127.0	150	104.6	104.7
D025 4-Methylphenol*	.010	0.335	0.335			ND		117.5	150	78.3	120.1
D034 Hexachloroethane*	.010	ND	ND			ND		62.6	100	62.6	100
D036 Nitrobenzene*	.010	ND	ND			ND		92.6	100	82.6	100
D033 Hexachlorobutadiene*	.010	ND	ND			ND		41.1	100	48.2	100
D042 2,4,6-Trichlorophenoxy*	.010	ND	ND			ND		120.5	150	80.3	102.6
D041 2,4,5-Trichlorophenoxy*	.050	ND	ND			ND		125.6	150	83.7	104.5
D030 2,4-Dinitrotoluene*	.010	ND	ND			ND		107.8	100	107.8	98.6
D032 Hexachlorobenzene*	.010	ND	ND			ND		88.0	100	57.3	77.2
D037 Pentachlorophenol*	.050	ND	ND			ND		149.4	150	99.6	138.4
SURROGATES:											
Fluorophenol						88.6	150	59.1	150	65.9	150
Phenol-d6						69.4	150	46.3	79.1	52.7	63.0
2-Chlorophenol-d4						150.9	150	100.6	150	136.8	150
1,2-Dichlorobenzene-d4						77.8	100	77.8	82.3	72.2	100
Nitrobenzene-d5						84.6	100	84.6	100	88.3	75.7
Fluorobiphenyl						81.7	100	81.7	100	71.6	100
2,4,6-Tribromophenol						138.9	150	92.6	144.3	124.0	124.0
Terphenyl-d14						120.3	100	119.4	100	113.5	105.1

Detected by: *Redding, Inc.*
MICHAEL S. BONNER, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

* MATRIX SPIKING COMPOUNDS

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
VOLATILES - GC/MS ANALYSIS DATA

Chain of Custody Data Required for BATCO Data Management Summary Reports

Method - SW-846 (8260)

Analysis FROM BACK FORTY SW

Collected: 05/10/95 @ 0800

Analyzed: 05/12/95 @ 1556

DATE FROM EDGE

TIME SAMPLE POINT

Compound	EPA HW ND.	SAMPLE		BLANK		REGULATORY LEVEL		MATRIX (BT26020)		DUPLICATE MATRIX (BT26020)	
		ND/L (ppm)	Detected Concen. ng/L (ppm)	Spike Amt. ng	Detected Concen. ng/L (ppm)	Spike Amt. ng	Detected Concen. ng/L (ppm)	Spike Amt. ng	Detected Concen. ng/L (ppm)	Spike Amt. ng	Detected Concen. ng/L (ppm)
D029 1,1-Dichloroethene	0.005	ND	0.202		ND		0.7		0.050	250	101.4
D018 Benzene	0.005	ND	0.005		ND		0.5		0.042	250	84.0J
D040 Trichloroethene	0.005	ND	0.001	J	ND		0.5		0.052	250	104.6
D021 Chlorobenzene	0.005	0.001	0.002	J	ND		100.0		0.051	250	102.0
D043 Vinyl Chloride	0.01	ND	0.032	J	ND		0.2		0.050	250	100.0
D035 2-Butanone (MEK)	0.005	0.002	0.002	J	ND		6.0		0.046	250	92.8
D022 Chloroform	0.005	ND	0.005	J	ND		0.5		0.056	250	111.8
D019 Carbon Tetrachloride	0.005	ND	0.005	ND	ND		0.5		0.052	250	104.0
D028 1,2-Dichloroethane	0.005	ND	0.005	ND	ND		0.7		0.059	250	117.8
D039 Tetrachlorethane	0.005	ND									
Surrogates:											
Dibromo Fluoromethane	43.1	250	86.2		49.0		98.0		43.7	250	87.4
Toluene-d8	47.3	250	94.6		48.0		96.0		48.8	250	97.6
4-Bromo Fluorobenzene	44.8	250	89.6		50.4		100.8		49.2	250	98.4

J - results estimated or Below Method Detection Level.

07-12-1995 01:20PM FROM BONNER A ANALYTICAL TESTIN

5843226 P.05

Certified by: *RICHARD BONNER, PH.D.*
 RICHARD BONNER, PH.D.
 BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
PESTICIDES & HERBICIDES - ECO ANALYSIS DATA

Chain of Custody Data Required for BATCO Data Management Summary Reports

Extraction Method EPA 1311. Analysis Method 8080/8150. Collected: 05/10/95
Sample: Sludge Pit-6 Analyzed: 05/26/95
TIME: 0800
DATE: 2234BT26020 Sample ID: BT26020
BTCO File #: BT26020Hercules Inc.
COMPANYTCLP EXTRACTION
SAMPLE TYPE

Compound EPA HM NO.	SAMPLE		BLANK		RECOVERY		MATRIX		DUPLICATE MATRIX		
	MDL (ppb)	Detected Concen. ug/L (ppb)	Spike Concen. ug/L (ppb)	Detected Amt. ng	Spike Concen. ug/L (ppb)	Detected Concen. ug/L (ppb)	Amt. ng	Spike Concen. ug/ml	Detected Concen. ug/ml	Amt. ng	Spike Concen. ug/ml
D013 * Lindane	2.68	ND	ND		400.0	1.09	2.0	54.7	1.20	2.0	60.0
D031 * Heptachlor	2.01	ND	ND		8.0	0.75	2.0	37.3	0.87	2.0	43.4
D012 * Endrin	4.02	ND	ND		20.0	1.62	2.0	81.0	1.72	2.0	86.0
D031 * Heptachlor Epoxide	55.6	ND	ND		8.0	1.29	2.0	64.6	1.38	2.0	69.0
D014 * Methoxychlor	117.9	ND	ND		10000.0	1.05	2.0	92.5	1.93	2.0	96.5
D020 Chlordane (technical)	9.38	ND	ND		30.0	ND	ND	ND	ND	ND	ND
D015 Toxaphene	160.8	ND	ND		500.0	0.94	2.0	47.2	0.99	2.0	49.6
D017 * 2,4,5-TP (Silvex)	0.28	ND	ND		1000.0	0.85	2.0	42.5	0.917	2.0	45.9
D016 * 2,4-0	0.11	ND	ND		10000.0	0.85	2.0	42.5	0.917	2.0	45.9
Surrogates:											
Tetrachloro-m-Xylene					0.11	0.2	0.032	0.2	15.9	0.04	0.2
Dichlorophenylacetic acid	0.106	0.2	53.0	4.35	56.8	5.0	2.40	48.0	2.37	5.0	47.4
Decachlorobiphenyl	5.670	5.0	113.5	0.29	87.1	0.2	0.183	0.2	91.7	0.19	0.2
Dichlorophenyl	0.220	0.2	110.0	0.29	148.3						

HERBICIDE ANALYZED ON 05/27/95 @ 1152.
* MATRIX SPiking COMPOUNDSCertified by: *Michael S. Bonner*
MICHAEL S. BONNER, PH.D.
BONNER ANALYTICAL TESTING COMPANY



BONNER ANALYTICAL TESTING COMPANY

Phone: 2703 Oak Grove Road Fax:
(601) 264-2854 Hattiesburg, MS 39402 (601) 268-7084

"Testing Your World for a Safer Tomorrow"

REMARKS:

Turnaround Time

Detection Limits
Special Limits Required
Yes No
Please circle one, if
please describe below
or include separate
sheet detailing
requirements.

PARAMETERS FOR ANALYSIS

PRESERVATIONS
NUMBER OF CONTAINERS

CHARTS/OUTLINES
REACTIVITY(CLASS)
Hazardous/CHEM
PCP - Polychlorobiphenyls
PCP - PCBs
PCP - DDT
PCP - Dieldrin
PCP - Heptachlor
PCP - Heptachlor epoxide
PCP - Mirex
PCP - Vana

YOUR COMPANY NAME: Hercules Inc
YOUR COMPANY ADDRESS: 1971 Pressburg Dr S
NAME OF PERSON TO CONTACT: C. Jordan
CONTACT PERSON'S PHONE: _____

YOUR PROJECT NO.: YOUR PO.# YOUR PROJECT NAME:

YOUR SAMPLE DESCRIPTION:

Sample from Back Forty
soil
Southwest Sludge Pit - 6' from edge

NUMBER OF CONTAINERS

CHARTS/OUTLINES
REACTIVITY(CLASS)
Hazardous/CHEM
PCP - Polychlorobiphenyls
PCP - PCBs
PCP - DDT
PCP - Dieldrin
PCP - Heptachlor
PCP - Heptachlor epoxide
PCP - Mirex
PCP - Vana

BT24020

BT24020

RELINQUISHED BY: (Signature)	DATE	TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE	TIME	RECEIVED BY: (Signature)
Joe Dennis	5/10/95	0910	ReLusion	COURIER (Signature)			
J.P.							

SAMPLE REMAINDER DISPOSAL
 RETURN SAMPLE REMAINDER TO CLIENT VIA _____
 (SOME SHIPPING CHARGES MAY BE INCURRED)

C I REQUEST BATCO TO DISPOSE OF ALL SAMPLE REMAINDERS

(Signature) _____ (Date) _____
 IF SAMPLE REMAINDER IS DETERMINED TO BE HAZARDOUS, A MINIMUM
 ADDITIONAL CHARGE OF \$2500 PER SAMPLE WILL BE ASSESSED FOR DISPOSAL

DATE
2/94
REVISION
2



Hercules Incorporated
West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401-1937
(601) 545-3450

April 22, 1992

Certified Mail - Return Receipt Requested
No. P 904 256 183

John C. Taylor
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

April 22, 1992 Inspection

Re your request, please find the attached TCLP extraction data on our wastewater sludge.

Very truly yours,

Charles S. Jordan
Environmental Supervisor

CSJ:mcl
42

Attachments

BONNER ANALYTICAL TESTING COMPANY
658 Weathersby Road
Hattiesburg, MS 39402
(601) 264-2854

Client: Hercules, Inc. (Attn: Charlie Jordan)

File Number: HER090490-19 Sample Date/Time: 9/04/90 10:00
Collected By: Client Date/Time Rec'd: 9/04/90 10:400
 Date/Time Begun: 9/04/90 10:400

TCIP Extraction

Parameter	Sludge	MDL	Date/Time/Analyst
<u>LEACHABLE METALS:</u>			
Arsenic	0.214	0.04	9-18-90/1121/LSC
Barium	0.18	0.2	9-18-90/1121/LSC
Cadmium	ND	0.02	9-18-90/1121/LSC
Chromium	0.05	0.04	9-18-90/1121/LSC
Lead	0.15	0.02	9-18-90/1121/LSC
Mercury	ND	0.001	9-18-90/1430/LSC
Selenium	0.154	0.04	9-18-90/1121/LSC
Silver	ND	0.04	9-18-90/1121/LSC
pH	4.10	0.01	9-19-90/1100/RWC
Total Solids	23.68	0.01	9-19-90/1330/RKM

Data reported in mg/l unless otherwise noted. All analyses performed in accordance with 40 CFR 136 and amendments.

MDL = Method Detection Limit.

Certified by:

Michael S. Bonner, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND DURABILITY ASSURANCE DATA
QUANTITIES TESTED: GC/MS/ICP/ATR/UV/VIS

Chain of Custody Date Received for BATCO Data Management Summary Reports
Analysis Method - CLP Statement of Work for Organic Analysis
Sample Type: SLUDGE
HERCULES COMPANY
HERC090-19
BATCO File #:

DUPLICATE MATRIX

Compound	HDL		SAMPLE		BLANK		DUPLICATE		DUPLICATE		DUPLICATE MATRIX		
	ug/L (PPb)	Detected: Concen. ug/L (PPb)	Spike Amt. ng										
-Dichloroethene	5	36.0											
zene	5	7.7											
chloroethene	5	NO											
orobenzene	5	NO											
yi Chloride	10	NO											
utanone (CHEX)	10	119.7											
oroform	5	NO											
bon Tetrachloride	5	NO											
-Dichloroethane	5	NO											
achloroethene	5	NO											
rogetes ¹													
-Dichloroethane-D ¹	15.1	90.8	49.7	250	99.1								
ueno-dB	52.6	250	105.2	51.1	102.3								
romofluorobenzene	51.2	250	102.5	52.7	105.5								

Compound	HDL		SAMPLE		BLANK		DUPLICATE		DUPLICATE		DUPLICATE MATRIX		
	ug/L (PPb)	Detected: Concen. ug/L (PPb)	Spike Amt. ng										
-Dichloroethene	5	36.0											
zene	5	7.7											
chloroethene	5	NO											
orobenzene	5	NO											
yi Chloride	10	NO											
utanone (CHEX)	10	119.7											
oroform	5	NO											
bon Tetrachloride	5	NO											
-Dichloroethane	5	NO											
achloroethene	5	NO											
rogetes ¹													
-Dichloroethane-D ¹	15.1	90.8	49.7	250	99.1								
ueno-dB	52.6	250	105.2	51.1	102.3								
romofluorobenzene	51.2	250	102.5	52.7	105.5								

Certified by GILDAEL S. BONNER, PH. D.

BONNER ANALYTICAL TESTING COMPANY

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
BASE NEUTRALS AND ACIDS - GC/MS ANALYSIS DATAChain of Custody Data Required for BATCO Data Management System Reports
Extraction Method - EPA 3520 Analysis Method - CLP Statement of Work for Organic AnalysisCollected: 09/01/90 Analyzed: 09/21/90 2148
TIME
HERCULES COMPANY SLUDGE SAMPLE POINT

Compound	HOL			SAMPLE			BLANK			DUPLICATE			DUPLICATE			DUPLICATE MATRIX			DUPLICATE MATRIX		
	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlorophenyl-phenyl ether	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
6-Dinitro-2-methyl Phenol	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrosodiphenylhydrazine	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Diphenoxyphenylether	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromophenylphenylether	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylbenzene	X	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
methachlorophenol	X	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ionanthrene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
thracone	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
an-butylphthalate	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
uoranthrene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
irene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
itylbenzophthalate	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
nzo(C ₆ H ₅) ₂ anthracene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
3, -Dichlorobenzene-dime	20	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
rysene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Cethoxyphenylphthalate	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
nzo(C ₆ H ₅) ₂ phthalate	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
nzo(C ₆ H ₅) ₂ fluoranthene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
nzo(C ₆ H ₅) ₂ benzene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
deno(1,2,3-c,d)pyrrene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
benzo(a,h)anthracene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
nzo(C ₆ H ₅) ₂ perylene	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RROGATES:																					
uorophenol	200	47.2	200	89.1	200	62.9	200	34.1	200	52.3	100	100	100	100	100	100	100	100	100	200	11.9
enol-d6	200	21.6	100	17.1	100	100.3	100	52.3	100	100	100	100	100	100	100	100	100	100	100	200	28.3
trobenzene-d5																					53.0
uorobiphenyl	100	13.8	100	90.9	100	17.8	200	93.5	200	200	100	100	100	100	100	100	100	100	100	200	17.8
1,6-Tribromophenol	200	97.9	200	101.6	100	120.1	100	100	100	100	100	100	100	100	100	100	100	100	100	200	55.6
rphenyl-d4																					51.2

* TCLP BASE, NEUTRALS AND ACIDS

Certified by:
MICHAEL S. BONNER, Ph.D.
BONNER ANALYTICAL TESTING COMPANY

Detected: Spike Concent. ug/g Recov. ug

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
BASE NEUTRALS AND ACIDS - GC/MS ANALYSIS DATA

Chain of Custody Data Required for BRTC Data Management Summary Reports

Extraction Method - EPA 3520 Analytical Method - CLP Statement of Work for Organic Analysis

Collected: 09/01/90 Analyzed: 09/21/90 21:18

DATE TIME

HERC090190-19 HERCULES

BRTC File #

SLUDGE

SAMPLE POINT

SAMPLE TYPE

Compound	SAMPLE			BLANK			DUPLICATE			MATRIX			DUPLICATE MATRIX					
	HDL ug/L	ug/L	Detected: Concent. ug/L (PPB)	Spike Concent. ug/L	Amt. ug	% Recov	Detected: Concent. ug/L (PPB)	Spike Concent. ug/L	Amt. ug	% Recov	Detected: Concent. ug/L	Spike Concent. ug/L	Amt. ug	% Recov	Detected: Concent. ug/L	Spike Concent. ug/L	Amt. ug	% Recov
Iridine	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ironol		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-sC2-chloroethyl ether		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Chlorophenol		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-3-Dichlorobenzene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-1,4-Dichlorobenzene	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-mxylool		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-2-Oxychlorobenzene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Methylphenol	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-sC2-chlorodisopropylid		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Methyl phenol	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Methylphenol	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-hexachloroethane	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Methane di-H-		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-propylamine		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Isophorone		10	ND	BHDL	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-4-Dimethylphenol		10	ND	BHDL	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrophenol		10	ND	BHDL	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
inzoic acid		SD	ND	BHDL	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-sC2-chlorothoxyd		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methane		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-4-Dichlorophenol		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Trichlorobenzene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
ipthalene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Chloroaniline		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-methylbenzidine		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Chloro-3-methylphenol	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-methylbenzidine		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-1,6-Trichlorophenol	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-1,5-Trichlorophenol	x	50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Chloronaphthalene		50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Nitroaniline		50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Naphthalene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-6-Dinitrotoluene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-Nitroaniline		50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-naphthalene		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-4-Dinitrophenol		50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-benzofuran		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-1-Dinitrotoluene	x	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
-ethylphthalate		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Varone		10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

x TCLP BASE NEUTRALS AND ACIDS

BONNER ANALYTICAL TESTING COMPANY

QUANTITATIVE RESULTS AND QUALITY ASSURANCE DATA
PESTICIDES & HERBICIDES - ECD ANALYSIS DATAChain of Custody Data Required for BATCO Data Management Summary Reports
Analysis Method - CLP Statement of Work for Organic AnalysisHERO00490-19
BATCO File #
HERCULES
COMPANYSLUDGE^{1,2}
SAMPLE TYPE

SAMPLE POINT

Compound	HOL ug/L (ppb)		SAMPLE		BLANK		HATRIX		DUPLICATE MATRIX	
	Detected: Concen. ug/L (ppb)	Spike: Concen. ug/L (ppb)	Detected: Ant. ug	Spike: % Recov	Detected: Concen. ug/L (ppb)	Spike: Ant. ug	Detected: Concen. ug/L (ppb)	Spike: % Recov	Detected: Concen. ug/L (ppb)	Spike: Ant. ug
Lindane X	1.0	ND	ND	ND	ND	ND	0.167	0.20	0.163	0.20
Heptachlor X	1.0	ND	ND	ND	ND	ND	0.151	0.20	85.5	86.5
Aldrin X	1.0	ND	ND	ND	ND	ND	0.168	0.20	75.5	80.5
Dieldrin X	1.0	13.4	ND	ND	ND	ND	0.130	0.50	84.0	80.5
Endrin X	1.0	ND	ND	ND	ND	ND	0.506	0.50	125	125
p,p'-DDT	1.0	ND	ND	ND	ND	ND	0.175	0.50	101.6	101.0
Alpha-BHC	1.0	ND	ND	ND	ND	ND	ND	ND	95.0	91.8
Beta-BHC	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Delta-BHC	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Heptachlor epoxide	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Endosulfan I	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,4-DOE	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Heptachlor X	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlordane X (alpha and gamma)	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toxaphene X	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
p,p'-DD	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Endosulfan sulfate	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Endrin ketone	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Endosulfan II	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
2,1,5-TP (Silver) X	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
2,4-Dichlorophenoxy acetic acid	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND
Surrogates:										
Dibutylchlororondato	0.0551	0.1	55.1	0.078	0.1	78.0	0.0915	0.1	91.5	0.077
Dichlorophenoxyacetic acid	0.0300	0.5	60.0	0.465	0.5	93.0			0.1	77.0

X TCLP PESTICIDES & HERBICIDES

Certified by MICHAEL S. BONNER Ph. D.
BONNER ANALYTICAL TESTING COMPANY

ATTACHMENT B

FIGURE 1

ATTACHMENT C

ANALYTICAL RESULTS - JULY 1, 2008



THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

Job Number: 680-38282-1

Job Description: Hercules Hattiesburg Sludge TCLP 7/1/08

For:
Hercules Inc.
Research Center - Bldg 8139/15
500 Hercules Road
Wilmington, DE 19808-1599
Attention: Mr. Timothy Hassett

Lidya Gulizia

Lidya Gulizia
Project Manager I
lidya.gulizia@testamericainc.com
07/21/2008

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. All questions regarding this test report should be directed to the TestAmerica Project Manager who signed this test report.

TestAmerica Laboratories, Inc.

TestAmerica Savannah 5102 LaRoche Avenue, Savannah, GA 31404

Tel (912) 354-7858 Fax (912) 352-0165 www.testamericainc.com



Job Narrative
680-J38282-1

Receipt

All samples were received in good condition within temperature requirements.

GC/MS VOA

No analytical or quality issues were noted.

GC/MS Semi VOA

No analytical or quality issues were noted.

GC Semi VOA

Method(s) 8151A: Surrogate recovery for the following sample was outside control limits: HER-SS1-070108 (680-38282-1). Re-extraction and re-analysis was performed with acceptable results. Both sets of data have been reported.

No other analytical or quality issues were noted.

Metals

No analytical or quality issues were noted.

General Chemistry

No analytical or quality issues were noted.

Comments

No additional comments.

METHOD SUMMARY

Client: Hercules Inc.

Job Number: 680-38282-1

Description	Lab Location	Method	Preparation Method
Matrix: Solid			
Volatile Organic Compounds by GC/MS	TAL SAV	SW846 8260B	
Toxicity Characteristic Leaching Procedure (ZHE)	TAL SAV		SW846 1311
Purge and Trap on Leachates	TAL SAV		SW846 5030B
Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)	TAL SAV	SW846 8270C	
Toxicity Characteristic Leaching Procedure	TAL SAV		SW846 1311
Continuous Liquid-Liquid Extraction	TAL SAV		SW846 3520C
Organochlorine Pesticides & Polychlorinated Biphenyls by Gas Chromatography	TAL SAV	SW846 8081A_8082	
Toxicity Characteristic Leaching Procedure	TAL SAV		SW846 1311
Continuous Liquid-Liquid Extraction	TAL SAV		SW846 3520C
Chlorinated Herbicides by GC	TAL SAV	SW846 8151A	
Toxicity Characteristic Leaching Procedure	TAL SAV		SW846 1311
Chlorinated Herbicides by GC - Aqueous Prep	TAL SAV		SW846 8151A
Inductively Coupled Plasma - Atomic Emission Spectrometry	TAL SAV	SW846 6010B	
Toxicity Characteristic Leaching Procedure	TAL SAV		SW846 1311
Acid Digestion of Aqueous Samples and Extracts for	TAL SAV		SW846 3010A
Mercury in Liquid Waste (Manual Cold Vapor Technique)	TAL SAV	SW846 7470A	
Toxicity Characteristic Leaching Procedure	TAL SAV		SW846 1311
Mercury in Liquid Waste (Manual Cold Vapor	TAL SAV		SW846 7470A
Reactive Cyanide Analysis using method 9014	TAL SAV	SW846 9014	
Cyanide, Reactive (SW7.3.3)	TAL SAV		SW846 7.3.3
Titrimetric Procedure for Acid-Soluble and Acid-Insoluble Sulfides	TAL SAV	SW846 9034	
Sulfide, Reactive (SW7.3.4)	TAL SAV		SW846 7.3.4
Soil and Waste pH	TAL SAV	SW846 9045C	

Lab References:

TAL SAV = TestAmerica Savannah

Method References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

METHOD / ANALYST SUMMARY

Client: Hercules Inc.

Job Number: 680-38282-1

Method	Analyst	Analyst ID
SW846 8260B	Bearden, Robert	RB
SW846 8270C	Johnson, Brad	BJ
SW846 8081A_8082	Kellar, Joshua	JK
SW846 8151A	Kellar, Joshua	JK
SW846 8151A	Smith, Crystal	CAS
SW846 6010B	Bland, Brian	BCB
SW846 7470A	Bland, Brian	BCB
SW846 9014	McDonald, Debbie	DM
SW846 9034	McDonald, Debbie	DM
SW846 9045C	Williams, Dyanne	DW

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS1-070108

Lab Sample ID: 680-38282-1

Date Sampled: 07/01/2008 1530

Client Matrix: Solid

Date Received: 07/03/2008 0852

8081A_8082 Organochlorine Pesticides & Polychlorinated Biphenyls by Gas Chromatography-TCLP

Method:	8081A_8082	Analysis Batch:	680-111410	Instrument ID:	GC SemiVolatiles - M
Preparation:	3520C	Prep Batch:	680-110858	Lab File ID:	mg11028.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	20 mL
Date Analyzed:	07/11/2008 1923			Final Weight/Volume:	10 mL
Date Prepared:	07/08/2008 1342			Injection Volume:	1.0 uL
Date Leached:	07/07/2008 1400			Column ID:	PRIMARY

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
Chlordane (technical)		<0.025		0.025
Endrin		<0.0050		0.0050
gamma-BHC (Lindane)		<0.0025		0.0025
Methoxychlor		<0.025		0.025
Heptachlor		<0.0025		0.0025
Heptachlor epoxide		<0.0025		0.0025
Toxaphene		<0.25		0.25

Surrogate	%Rec	Acceptance Limits
Tetrachloro-m-xylene	56	35 - 120
DCB Decachlorobiphenyl	67	14 - 115

SAMPLE SUMMARY

Client: Hercules Inc.

Job Number: 680-38282-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
680-38282-1	HER-SS1-070108	Solid	07/01/2008 1530	07/03/2008 0852
680-38282-2	HER-SS2-070108	Solid	07/01/2008 1545	07/03/2008 0852
680-38282-3	HER-SS3-070108	Solid	07/01/2008 1700	07/03/2008 0852

TestAmerica

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

Serial Number 007855

TestAmerica Savannah
5102 LaRoche Avenue
Savannah, GA 31404



✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

SAMPLE RESULTS

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS1-070108

Lab Sample ID: 680-38282-1

Date Sampled: 07/01/2008 1530

Client Matrix: Solid

Date Received: 07/03/2008 0852

8260B Volatile Organic Compounds by GC/MS-TCLP

Method:	8260B	Analysis Batch:	680-111100	Instrument ID:	GC/MS Volatiles - A
Preparation:	5030B			Lab File ID:	a0869.d
Dilution:	20	Leachate Batch:	680-110884	Initial Weight/Volume:	5 mL
Date Analyzed:	07/09/2008 1803			Final Weight/Volume:	5 mL
Date Prepared:	07/09/2008 1803				
Date Leached:	07/07/2008 1515				

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
Benzene		1.3		0.020
Carbon tetrachloride		<0.020		0.020
Chlorobenzene		<0.020		0.020
Chloroform		0.19		0.020
1,2-Dichloroethane		<0.020		0.020
1,1-Dichloroethene		<0.020		0.020
2-Butanone (MEK)		<0.20		0.20
Tetrachloroethene		<0.020		0.020
Trichloroethene		<0.020		0.020
Vinyl chloride		<0.020		0.020
Surrogate	%Rec		Acceptance Limits	
4-Bromofluorobenzene	91		75 - 120	
Dibromofluoromethane	87		75 - 121	
Toluene-d8 (Surr)	102		75 - 120	

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS2-070108

Lab Sample ID: 680-38282-2

Date Sampled: 07/01/2008 1545

Client Matrix: Solid

Date Received: 07/03/2008 0852

8260B Volatile Organic Compounds by GC/MS-TCLP

Method:	8260B	Analysis Batch:	680-111100	Instrument ID:	GC/MS Volatiles - A
Preparation:	5030B			Lab File ID:	a0863.d
Dilution:	20	Leachate Batch:	680-110884	Initial Weight/Volume:	5 mL
Date Analyzed:	07/09/2008 1606			Final Weight/Volume:	5 mL
Date Prepared:	07/09/2008 1606				
Date Leached:	07/07/2008 1515				

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
Benzene		0.21		0.020
Carbon tetrachloride		<0.020		0.020
Chlorobenzene		<0.020		0.020
Chloroform		<0.020		0.020
1,2-Dichloroethane		<0.020		0.020
1,1-Dichloroethene		<0.020		0.020
2-Butanone (MEK)		<0.20		0.20
Tetrachloroethene		<0.020		0.020
Trichloroethene		<0.020		0.020
Vinyl chloride		<0.020		0.020
Surrogate		%Rec	Acceptance Limits	
4-Bromofluorobenzene		92		75 - 120
Dibromofluoromethane		85		75 - 121
Toluene-d8 (Surf)		104		75 - 120

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS3-070108

Lab Sample ID: 680-38282-3

Date Sampled: 07/01/2008 1700

Client Matrix: Solid

Date Received: 07/03/2008 0852

8260B Volatile Organic Compounds by GC/MS-TCLP

Method:	8260B	Analysis Batch:	680-111100	Instrument ID:	GC/MS Volatiles - A
Preparation:	5030B			Lab File ID:	a0864.d
Dilution:	20	Leachate Batch:	680-110884	Initial Weight/Volume:	5 mL
Date Analyzed:	07/09/2008 1626			Final Weight/Volume:	5 mL
Date Prepared:	07/09/2008 1626				
Date Leached:	07/07/2008 1515				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	RL
Benzene		<0.020		0.020
Carbon tetrachloride		<0.020		0.020
Chlorobenzene		<0.020		0.020
Chloroform		<0.020		0.020
1,2-Dichloroethane		<0.020		0.020
1,1-Dichloroethene		<0.020		0.020
2-Butanone (MEK)		<0.20		0.20
Tetrachloroethene		<0.020		0.020
Trichloroethene		<0.020		0.020
Vinyl chloride		<0.020		0.020
Surrogate		%Rec		Acceptance Limits
4-Bromofluorobenzene		93		75 - 120
Dibromofluoromethane		89		75 - 121
Toluene-d8 (Surr)		108		75 - 120

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS1-070108

Lab Sample ID: 680-38282-1

Date Sampled: 07/01/2008 1530

Client Matrix: Solid

Date Received: 07/03/2008 0852

8270C Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)-TCLP

Method:	8270C	Analysis Batch:	680-111536	Instrument ID:	GC/MS SemiVolatiles - G
Preparation:	3520C	Prep Batch:	680-110963	Lab File ID:	g3223.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	200 mL
Date Analyzed:	07/12/2008 2133			Final Weight/Volume:	1 mL
Date Prepared:	07/09/2008 1404			Injection Volume:	1.0 uL
Date Leached:	07/07/2008 1400				

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
1,4-Dichlorobenzene		<0.050		0.050
2,4-Dinitrotoluene		<0.050		0.050
Hexachloroethane		<0.050		0.050
Hexachlorobenzene		<0.050		0.050
Hexachlorobutadiene		<0.050		0.050
Methyl Phenols, Total		0.29		0.10
Nitrobenzene		<0.050		0.050
Pentachlorophenol		<0.25		0.25
Pyridine		<0.25		0.25
2,4,5-Trichlorophenol		<0.050		0.050
2,4,6-Trichlorophenol		<0.050		0.050
Surrogate	%Rec		Acceptance Limits	
2,4,6-Tribromophenol	76		40 - 139	
2-Fluorobiphenyl	69		50 - 113	
2-Fluorophenol	66		36 - 110	
Nitrobenzene-d5	80		45 - 112	
Phenol-d5	71		38 - 116	
Terphenyl-d14	38		10 - 121	

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS2-070108

Lab Sample ID: 680-38282-2

Date Sampled: 07/01/2008 1545

Client Matrix: Solid

Date Received: 07/03/2008 0852

8270C Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)-TCLP

Method:	8270C	Analysis Batch:	680-111536	Instrument ID:	GC/MS SemiVolatiles - G
Preparation:	3520C	Prep Batch:	680-110963	Lab File ID:	g3224.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	200 mL
Date Analyzed:	07/12/2008 2155			Final Weight/Volume:	1 mL
Date Prepared:	07/09/2008 1404			Injection Volume:	1.0 uL
Date Leached:	07/07/2008 1400				

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	RL
1,4-Dichlorobenzene		<0.050		0.050
2,4-Dinitrotoluene		<0.050		0.050
Hexachloroethane		<0.050		0.050
Hexachlorobenzene		<0.050		0.050
Hexachlorobutadiene		<0.050		0.050
Methyl Phenols, Total		0.72		0.10
Nitrobenzene		<0.050		0.050
Pentachlorophenol		<0.25		0.25
Pyridine		<0.25		0.25
2,4,5-Trichlorophenol		<0.050		0.050
2,4,6-Trichlorophenol		<0.050		0.050
Surrogate		%Rec	Acceptance Limits	
2,4,6-Tribromophenol		71	40 - 139	
2-Fluorobiphenyl		65	50 - 113	
2-Fluorophenol		57	36 - 110	
Nitrobenzene-d5		68	45 - 112	
Phenol-d5		60	38 - 116	
Terphenyl-d14		57	10 - 121	

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS3-070108

Lab Sample ID: 680-38282-3

Date Sampled: 07/01/2008 1700

Client Matrix: Solid

Date Received: 07/03/2008 0852

8270C Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)-TCLP

Method:	8270C	Analysis Batch:	680-111536	Instrument ID:	GC/MS SemiVolatiles - G
Preparation:	3520C	Prep Batch:	680-110963	Lab File ID:	g3225.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	200 mL
Date Analyzed:	07/12/2008 2217			Final Weight/Volume:	1 mL
Date Prepared:	07/09/2008 1404			Injection Volume:	1.0 uL
Date Leached:	07/07/2008 1400				

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
1,4-Dichlorobenzene		<0.050		0.050
2,4-Dinitrotoluene		<0.050		0.050
Hexachloroethane		<0.050		0.050
Hexachlorobenzene		<0.050		0.050
Hexachlorobutadiene		<0.050		0.050
Methyl Phenols, Total		0.18		0.10
Nitrobenzene		<0.050		0.050
Pentachlorophenol		<0.25		0.25
Pyridine		<0.25		0.25
2,4,5-Trichlorophenol		<0.050		0.050
2,4,6-Trichlorophenol		<0.050		0.050
Surrogate		% Rec	Acceptance Limits	
2,4,6-Tribromophenol		78	40 - 139	
2-Fluorobiphenyl		69	50 - 113	
2-Fluorophenol		60	36 - 110	
Nitrobenzene-d5		66	45 - 112	
Phenol-d5		67	38 - 116	
Terphenyl-d14		44	10 - 121	

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS2-070108

Lab Sample ID: 680-38282-2

Date Sampled: 07/01/2008 1545

Client Matrix: Solid

Date Received: 07/03/2008 0852

8081A_8082 Organochlorine Pesticides & Polychlorinated Biphenyls by Gas Chromatography-TCLP

Method:	8081A_8082	Analysis Batch:	680-111410	Instrument ID:	GC SemiVolatiles - M
Preparation:	3520C	Prep Batch:	680-110858	Lab File ID:	mg11029.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	20 mL
Date Analyzed:	07/11/2008 1942			Final Weight/Volume:	10 mL
Date Prepared:	07/08/2008 1342			Injection Volume:	1.0 uL
Date Leached:	07/07/2008 1400			Column ID:	PRIMARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	RL
Chlordane (technical)		<0.025		0.025
Endrin		<0.0050		0.0050
gamma-BHC (Lindane)		<0.0025		0.0025
Methoxychlor		<0.025		0.025
Heptachlor		<0.0025		0.0025
Heptachlor epoxide		<0.0025		0.0025
Toxaphene		<0.25		0.25

Surrogate	%Rec	Acceptance Limits
Tetrachloro-m-xylene	69	35 - 120
DCB Decachlorobiphenyl	95	14 - 115

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS3-070108

Lab Sample ID: 680-38282-3

Date Sampled: 07/01/2008 1700

Client Matrix: Solid

Date Received: 07/03/2008 0852

8081A_8082 Organochlorine Pesticides & Polychlorinated Biphenyls by Gas Chromatography-TCLP

Method:	8081A_8082	Analysis Batch: 680-111410	Instrument ID: GC SemiVolatiles - M
Preparation:	3520C	Prep Batch: 680-110858	Lab File ID: mg11030.d
Dilution:	1.0	Leachate Batch: 680-110821	Initial Weight/Volume: 20 mL
Date Analyzed:	07/11/2008 2001		Final Weight/Volume: 10 mL
Date Prepared:	07/08/2008 1342		Injection Volume: 1.0 uL
Date Leached:	07/07/2008 1400		Column ID: PRIMARY

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
Chlordane (technical)		<0.025		0.025
Endrin		<0.0050		0.0050
gamma-BHC (Lindane)		<0.0025		0.0025
Methoxychlor		<0.025		0.025
Heptachlor		<0.0025		0.0025
Heptachlor epoxide		<0.0025		0.0025
Toxaphene		<0.25		0.25
Surrogate	%Rec		Acceptance Limits	
Tetrachloro-m-xylene	60		35 - 120	
DCB Decachlorobiphenyl	53		14 - 115	

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS1-070108

Lab Sample ID: 680-38282-1

Date Sampled: 07/01/2008 1530

Client Matrix: Solid

Date Received: 07/03/2008 0852

8151A Chlorinated Herbicides by GC-TCLP

Method:	8151A	Analysis Batch:	680-111302	Instrument ID:	GC SemiVolatile - S
Preparation:	8151A	Prep Batch:	680-110848	Lab File ID:	sf10048.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	10 mL
Date Analyzed:	07/11/2008 0239			Final Weight/Volume:	10 mL
Date Prepared:	07/08/2008 0822			Injection Volume:	1 uL
Date Leached:	07/07/2008 1400			Column ID:	PR MARY

Analyte	DryWt Corrected: N	Result (mg/L)	Qualifier	RL
2,4-D		<0.050		0.050
Silvex (2,4,5-TP)		<0.050		0.050

Surrogate	%Rec	X	Acceptance Limits
DCAA	49		61 - 120

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS1-070108

Lab Sample ID: 680-38282-1

Date Sampled: 07/01/2008 1530

Client Matrix: Solid

Date Received: 07/03/2008 0852

8151A Chlorinated Herbicides by GC-TCLP

Method:	8151A	Analysis Batch:	680-111770	Instrument ID:	GC SemiVolatiles - S
Preparation:	8151A	Prep Batch:	680-111394	Lab File ID:	sg15016.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	10 mL
Date Analyzed:	07/15/2008 2137	Run Type:	RE	Final Weight/Volume:	10 mL
Date Prepared:	07/14/2008 0804			Injection Volume:	1 uL
Date Leached:	07/07/2008 1400			Column ID:	SECONDARY

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
2,4-D		<0.050		0.050
Silvex (2,4,5-TP)		<0.050		0.050

Surrogate	%Rec	Acceptance Limits
DCAA	83	61 - 120

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS2-070108

Lab Sample ID: 680-38282-2

Date Sampled: 07/01/2008 1545

Client Matrix: Solid

Date Received: 07/03/2008 0852

8151A Chlorinated Herbicides by GC-TCLP

Method:	8151A	Analysis Batch:	680-111302	Instrument ID:	GC SemiVolatile - S
Preparation:	8151A	Prep Batch:	680-110848	Lab File ID:	sf10049.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	10 mL
Date Analyzed:	07/11/2008 0258			Final Weight/Volume:	10 mL
Date Prepared:	07/08/2008 0822			Injection Volume:	1 uL
Date Leached:	07/07/2008 1400			Column ID:	PRIMARY

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
2,4-D		<0.050		0.050
Silvex (2,4,5-TP)		<0.050		0.050

Surrogate	%Rec	Acceptance Limits
DCAA	103	61 - 120

Analytical Data

Client: Hercules Inc.

Job Number: 680-38282-1

Client Sample ID: HER-SS3-070108

Lab Sample ID: 680-38282-3

Date Sampled: 07/01/2008 1700

Client Matrix: Solid

Date Received: 07/03/2008 0852

8151A Chlorinated Herbicides by GC-TCLP

Method:	8151A	Analysis Batch:	680-111302	Instrument ID:	GC SemiVolatile - S
Preparation:	8151A	Prep Batch:	680-110848	Lab File ID:	sf10050.d
Dilution:	1.0	Leachate Batch:	680-110821	Initial Weight/Volume:	10 mL
Date Analyzed:	07/11/2008 0317			Final Weight/Volume:	10 mL
Date Prepared:	07/08/2008 0822			Injection Volume:	1 uL
Date Leached:	07/07/2008 1400			Column ID:	PRIMARY

Analyte	Dry Wt Corrected: N	Result (mg/L)	Qualifier	RL
2,4-D		<0.050		0.050
Silvex (2,4,5-TP)		<0.050		0.050

Surrogate	%Rec	Acceptance Limits
DCAA	98	61 - 120