Appendix D

95% UCL for TCLP Benzene



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MEMO

To:

Jay Reid

Copies

Craig Derouen, Tim Ratchford

From:

Mark Lupo

Date:

May 28, 2010

ARCADIS Project No.:
OH003000.MS24

Subject

Benzene TCLP Data Evaluation, Hattiesburg, Mississippi

The Toxicity Characteristic Leaching Procedure (TCLP) was used to evaluate the leaching potential of benzene in sludge samples collected from the IB Basin at the Hercules Facility location in Hattiesburg, Mississippi. The purpose of this memo is to estimate the true mean of the TCLP results for comparison to United States Environmental Protection Agency (USEPA) Resource Conservation and Recovery Act (RCRA) standards to determine if the material exhibits hazardous characteristics.

Data Evaluation

The 16 data points are presented in Table 1 in descending numerical order. Three of the data points had benzene concentrations below the detection limit of 0.02 mg/L. These points were replaced by half of the analytical detection limit. The adjusted data set was evaluated.

The sample mean of the data is 0.2348 mg/L, but the true mean is not known, because to measure this would require sampling the entire volume of the sludge, which is not practical. Statistics can be used to construct an interval that contains the true mean with 95% confidence. The rationale is that the upper limit of this interval, the 95% upper confidence limit (UCL) represents the upper limit of the true mean with 95% confidence.

One necessary precondition for the construction of a confidence limit is that the data be normally distributed. The USEPA recommends the Shapiro-Wilk test for normality. The data were tested with the

Page:

Shapiro-Wilk test and found to exhibit non-normal characteristics. These data failed the normality test because of the presence of three high data points. The data set was tested for outliers using the Dixon Test for Outliers, and the three high points were identified as statistically significant outliers. The data were transformed with successive transformations following the ladder of powers. The first transformation to pass the normality test at 5% significance was the logarithmic transformation. Therefore, the data set is lognormally distributed. Attached to this memo is a probability plot generated by the ChemStat statistical package (version 5.2.0.0) of the log-transformed data. The linear trend can be seen for all but the three non-detections.

Table 1 shows the log-transformed data. A natural logarithm was used to transform the data. It should be noted that when the transformed data set was tested with Dixon's Test for Outliers, no statistically significant outliers were identified.

The 95% UCL was computed from the sample mean \bar{x} , the sample standard deviation s, and the number of data points n, using the following formula:

$$UCL = \exp\left(\overline{x} + \frac{s t_{(n-1,0.95)}}{\sqrt{n}}\right)$$

The t-statistic $t_{(n-1, 0.95)}$ was obtained from a table in the groundwater statistical guidance document (USEPA, 1989). The inputs and the result are presented in Table 1. The 95% UCL was computed to be 0.159 mg/L.

Discussion

The computed 95% UCL was lower than the arithmetic mean. This was to be expected in a lognormal data set, because the arithmetic mean in such a skewed data set is dominated by the highest data points. In data that are logarithmically distributed, it is the geometric mean, and not the arithmetic mean around which the confidence interval is constructed. The geometric mean of the adjusted, non-transformed data set was 0.082 mg/L (Table 1). To construct an interval around the arithmetic mean in a lognormally distributed data set, Land's procedure is often used. However, this procedure can introduce results that are described as "biased" and "extreme" (USEPA, 2009), particularly when the coefficient of variation is high. This procedure was not used for these data.

The data set is partially censored; there were 3 nondetections out of 16 data points. This is a detection frequency of 81.3%. USEPA guidance recommends that some form of adjustment, such as Cohen's Adjustment, be applied when the detection frequency is between 50% and 85%, and that nonparametric

methods be used when the detection frequency is below 50%. Cohen's adjustment was not applied, because it can introduce bias in transformed data sets. It was considered to introduce less bias to omit the adjustment on a data set that was only somewhat more censored than the 85% detection guideline.

Had the normality issue been ignored and a UCL been computed around the untransformed arithmetic mean, the "UCL" would have been estimated as 0.401 mg/L, a value that is still below the 0.5 mg/L criterion.

Conclusion

The benzene TCLP data were found to be lognormally distributed. The sample geometric mean of the benzene TCLP data set was 0.082 mg/L. One can be 95% confident that the true geometric mean of these data is 0.159 mg/L or less. Therefore, the true mean TCLP concentration is expected to be less than 0.5 mg/L, the TCLP limit for benzene.

Table 1. Calculation of the 95% Upper Confidence Limit of Benzene TCLP Results, Ashland Inc., Hattiesburg, Mississippi

	Original Benzene	Adjusted Benzene	Log-transformed Benzene
Location	mg/L	mg/L	mg/L
IBS-7-LS	1.3	1.3	0.2624
IBS-7-LS	0.96	0.96	-0.0408
IBS-3-LS	0.55	0.55	-0.5978
IBS-1-03	0.21	0.21	-1.5606
IBS-1-LS	0.14	0.14	-1.9661
IBS-0-LS	0.13	0.13	-2.0402
IBS-2-LS	0.12	0.12	-2.1203
IBS-3-05	0.1	0.1	-2.3026
IBS-0-LS	0.058	0.058	-2.8473
IBS-2-05 IBS-4-LS	0.052	0.052	-2.9565
IBS-4-LS IBS-5-LS	0.043	0.043	-3.1466
IBS-5-LS	0.038	0.038	-3.2702
IBS-4-03 IBS-5-US	0.025	0.025	-3.6889
- —	<0.02	0.01	-4.6052
IBS-6-US	<0.02	0.01	-4.6052
IBS-7-US	<0.02	0.01	-4.6052
IBS-8-US	1		
Ozemlo mo:	an	0.2348	-2.5057
Sample me		0.3784	1.5255
_	, viation	16	16
number		81.3%	81.3%
frequency		1.753	1.753
t _(n-1,0.95)			-1.837
raw UCL		0.401	0.159
UCL			
median		0.079	
	of variation	1.61	-0.61
geometric		0.082	

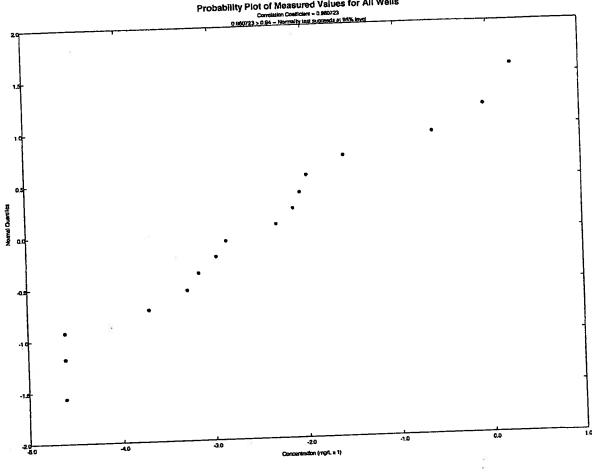
Notes:

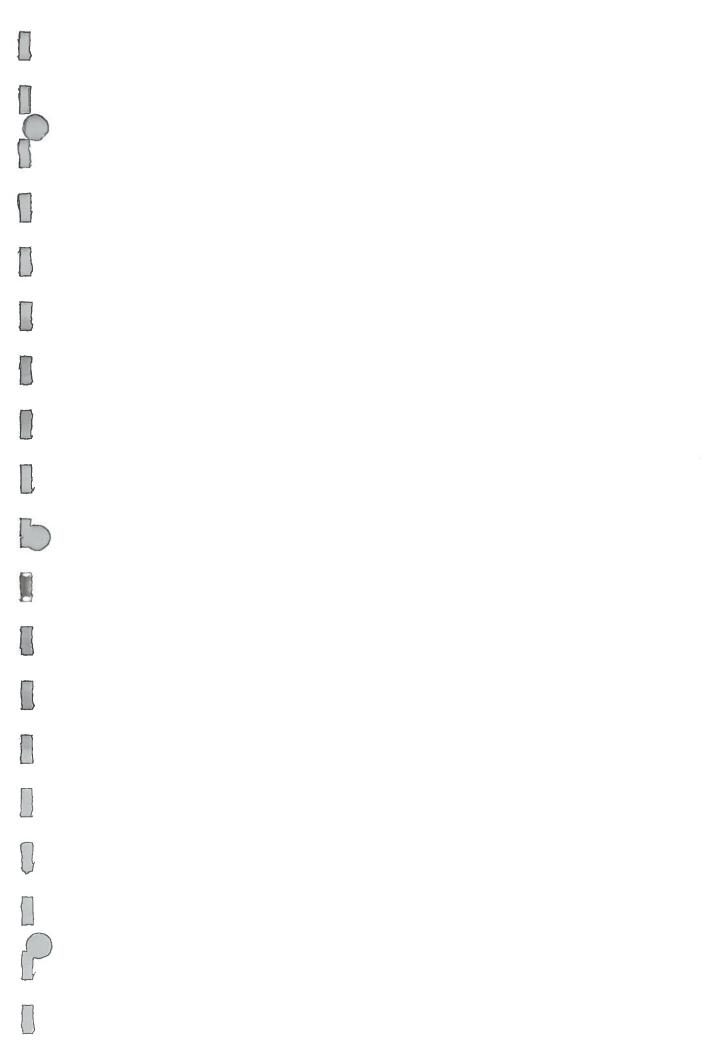
mg/L: milligrams per liter Data were adjusted by replacing the non-detections with numerical values equal to half of the detection limit.

A natural logarithm was used for the transformation.

The term "raw UCL" refers to a UCL computed prior to the necessary step of inverse transformation.

Benzene Probability Plot of Measured Values for All Wells Correlation Coefficient = 0 980723 0 960723 > 0.94 - Normally uses augments at 85% level







Appendix E

POTW Effluent Discharge Calculations

	srcules incorpora	Hercules Incorpolated, Transcoors,	-				do Doeulte				Maximum Da	Maximum Dally Discharge ⁽¹⁾	_
	Discha	Discharge Limitations	+			Sam	Sample Resours				Pounds of	Maximum	_
POTW Discharge Permit Parameter	Quantity / Loading Average	Quantity / Loading Ui Maximum	Units 0	IBS-4 Centrifuge Centrate (250 ppm Anion Polymer)	IBS 4 Centrifuge Centrate (250 ppm Cation Polymer)	IBS-4 Centrifuge Centrate (No Polymer)	IBS-4 Filter Press Filtrate	IBS-4 Gravity Dewatering Liquid	IBS-8 Filter Press Filtrate	Units	Parameter Per Galion of Water	ĕĕ	ed
	(Monthly	(Daily Maximum)		6/23/2010	6/23/2010	6/23/2010	6/23/2010	6/23/2010	6/23/2010		Pounds	Gallons	1
	Year and	•	-						1000	ma/L	¥ Z	Y Y	
				1000	< 0.001	< 0.001	< 0.500	00.00	× 0.001	mg/L	₹ Z	¥ S	
1 1 1-Trichloroethane Effluent	0.064	0,175 10	bs/day	× 0.001	< 0.001	, 0,001 100,00	< 0.500 < 0.500	× 0.001	< 0.001	mg/L	4 4 Z 2	¥ ¥	
1 1.2-Trichloroethane Effluent	0.093		bs/day	< 0.001	× 0,001	, 000 v	< 0.500	< 0.001	< 0.001	רויפר ה	Y Z	¥	
1,1-Dichloroethane Effluent	1900		bs/day	< 0.001	790.0	< 0.050	< 0.330	< 0.010	620'0 >	John J	ž	¥	
1,1-Dichloroethylene Effluent	0.572		bs/day		7900 >	< 0.050	< 0,330	0000 >	× 0.023	ma/L		¥ Z	
1,2,4-Trichlorobenzene Emueric	0.572		lbs/day	× 0.06 ×	× 0.001	< 0.001	< 0.500	, v 0.00	× 0.001	mg/L	_	Y :	
1,2-Dichlorobenzene Einaen	0.525		lbs/day		× 0.001	< 0.001	< 0.500	100.0	< 0.001	mg/L	_	¥ ÷	
1,2-Dichloroemane Effluent	0.572		DS/day		< 0.001	< 0.001	00.500	× 0.010	< 0.029	mg/L		Z 2	
1 2-Transdichloroethylene Effluent	0.073		hs/day	< 0.067	< 0.067	0.050	0.50	< 0.001	< 0,001	mg/L		£ 5	
1.3-Dichlorobenzene Effluent	0.414	- 6	lbs/day	< 0.001	< 0,001	< 0.001	0.300	< 0.001	< 0.001	mg/L		2 2	
1.3-Dichloropropylene, cis Effluent ⁽²⁾	0,572		hs/day	< 0.001	< 0.001	0.00	× 0.330	< 0.010	< 0.029	mg/L		Z Z	
1.3-Dichloropropylene, trans Effluent	0.572	1.11	lbs/day	< 0.067	< 0.067 - 223	00,030	< 0.330	< 0.010	< 0.029	mg/L	Y A	¥Z	
1,4-Dichlorobenzene Effluent	± 50 C	0.674	lbs/day	< 0.067	\ 0.06 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	< 0.250	< 0.170	< 0.050	< 0.140	John John		¥Z	
2-Nitrophenol Effluent	0.228	0.809	lbs/day	< 0.330	V 0.330	< 0.250	< 0.170	< 0.050	V 0.140	T John		¥ Z	
4,6-Dinitro-o-cresol Effluent	0.473	1.68	lbs/day	< 0.330	< 0.067	< 0.050	< 0.330	0.010	< 0.029	mg/L			,
4-Nitrophenol Emuent	0.055	0.137	bs/day	790.0	< 0.067	< 0.050	< 0.330	0000	0.0013	mg/L	1.08		3,616,754
Acenaphriere Elliuena	0.055	0,137	ibs/day	0000	< 0.001	× 0.001	005.0 >	× 0.010	< 0.029	mg/L	_	Z Z	
Anulacere Effuent	0.166	0.391	lbs/day		< 0.067	× 0.050	< 0.500	< 0.001	< 0.001	mg/L		Z Z	
Bis(2-ethylhexyl)phthalate Effluent	0.27	111	lbs/day	< 0,001	< 0.001	1000	< 0.500	< 0.001	< 0.001 0.001	Je i	Y 2	Ž	
Carbon tetrachloride Effluent	4140	111	lbs/day	< 0.001	× 0.001	0000	< 0.500	< 0.001	× 0.001	Tight.		¥	_
Chlorobenzene Effluent	0.321	0.861	lbs/day	× 0,001	1000	× 0.001	< 0.500	< 0.001 0.001	00.00	1/em		¥ Z	_
Chioroethane Effluent	324	0.949	lbs/day	100.00	790.0 >	< 0.050	< 0,330	00.00				₹ Z	_
Chloroform Effluent	0.134	0.33	lbs/day	/ 00.00 v	< 0.067	< 0.050	< 0.330	010.0 >			_	¥.	d .
Diethyl phthalate Emilian	0.055	0.137	bs/day	70.067	< 0.067	< 0.050	< 0.330	V 0.010					⋖・
Dimethyl primalate Ellidelik	0.058	0,126	ibs/day	2000	< 0.001	< 0.001	< 0,500 < 0,500	000 4			_		∢ <
City beaven Efficient	0.414	1,11	ine/day	< 0.067	< 0.067	< 0.050	055.0 >	< 0.010			_		٤ 4
Finoranthene Effluent	0.064	0.130	hs/day	< 0.067	< 0.067	0.050	< 0.330	< 0.010					: ∢
Fluorene Effluent	0.055		lbs/day		< 0.067	0500 ×	< 0.330	< 0.010			mg/L NA		∶≤
Hexachlorobenzene Effluent	0.572		lbs/day		< 0.067	< 0.050	< 0,330	< 0.010	0.029		_		≰
Hexachlorobutadiene Effluent	0.572		lbs/day	× 0.067	× 0.001	< 0.001	< 0.500	100.0 >			mg/L NA		¥.
Hexachioroetilarie Eringen. Methyl Chloride (Chloromethane) Effluent	11 0,321	0.861	los/day lbs/day	, v 	< 0,005	< 0.005	< 2.500 < 0.330				_		⊊
Methylene Chloride Effluent			lbs/day	/ < 0.067	/90.0 >	2000							
Naphthalene Emuent	-												Page

Summary of Potential POTW Effluent Data, Hercules Incorporated, Hattlesburg, Mississippi.

be Discharged Water that Can Maximum Daily Discharge⁽¹⁾ Pounds of Parameter Per 2,32848E-06 Pounds Gallon of ≰ ₹ Water mg/L mg/L mg/L mg/L mg/L Units IBS-8 Filter Press 0.0290.0290.0290.0010.1000.0010.001 6/23/2010 Filtrate IBS-4 Gravity Dewatering Liquid 0.0100.0100.0100.0010.0010.0010.0010.001 6/23/2010 IBS-4 Filter Press Filtrate < 0.330 < 0.330 < 0.330 < 0.500 < 0.500 < 0.500 6/23/2010 Sample Results IBS-4 Centrifuge Centrate (No 0.0500.0500.0500.0500.0010.0010.0010.001 6/23/2010 Polymer) IBS-4 Centrifuge 0.067
0.067
0.067
0.001
0.0052 J
0.001
0.001 Centrate (250 ppm Cation 6/23/2010 Polymer) IBS-4 Centrifuge Centrate (250 6/23/2010 ppm Anion 0.0670.0670.0670.0010.0010.0010.001 Polymer) lbs/day lbs/day lbs/day lbs/day lbs/day lbs/day Units Discharge Limitations (Dally Maximum) Quantity / Loading 18.7 0.137 0.14 0.479 0.216 0.201 0.502 Maximum (Monthly Average) Quantity / Loading 6.53 0.055 0.058 0.152 0.082 0.076 Average POTW Discharge Permit Parameter Tetrachloroethylene Effluent Trichloroethylene Effluent Nitro-Benzene Effluent Phenanthrene Effluent Vinyl chloride Effluent Toluene Effluent Pyrene Effluent Appendix E.

Amount of Maximum

Gailons

per Day

The MDEQ POTW Discharge Permit limitations are based on a loading rate. This rate does not take into consideration exceedances of RCRA toxicity characteristic levels. Imitations presented herein area based on the assumption that all parameter concentrations remain below toxicity characteristic levels. The MDEQ POTW Discharge Permit lists a discharge limit for 1,3-Dichloropropylene. This limit was used for the cis- or trans- isomer listed.

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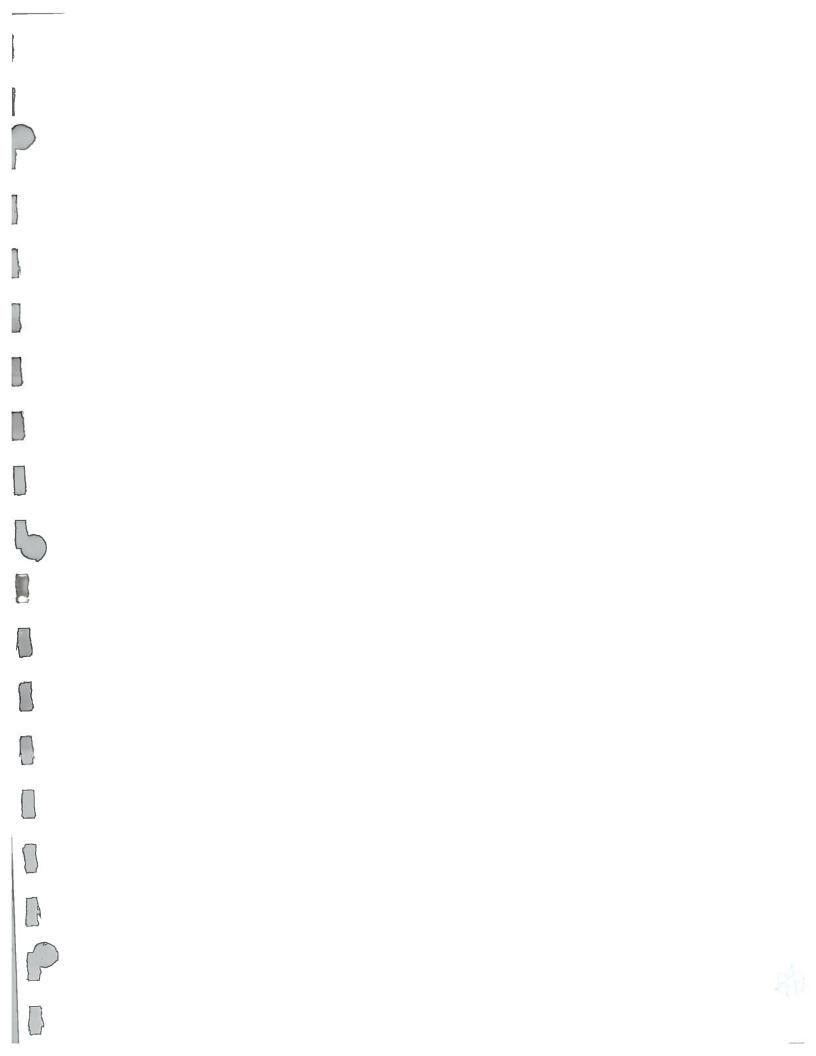
Estimated concentration. Pounds per day.

Mississippi Department of Environmental Quality. Miligrams per liter.

Not applicable.

ibs/day MDEQ mg/L NA POTW RCRA

Publiciy Owned Treatment Works. Resource Conservation and Recovery Act.



Appendix F

Dewatering Report



TMA Environmental, Inc.

P.O. Box 150 • Gonzales, LA 70707-0150 Phone: 225.677.8800 • Fax: 225.673.9286

June 21, 2010

Mr. Craig Derouen ARCADIS U.S. Inc. 10352 Plaza America Baton Rouge, La 70816 Job No. 36810

Re: Sludge Dewatering Overview

TMA appreciates the opportunity to submit this information on the above referenced project. We are a "Total Service Company" assuring our clients the value-added service necessary to meet their Chemical cleaning, Hydroblasting and Vacuum truck services needs in the most cost effective manner.

TMA Environmental received 4 samples of sludge in 4 separate 5 gallon plastic buckets (with lids) to be studied for dewatering treatability and dewatering simulations performed. The 4 sample buckets were labeled IBS-2, IBS-4, IBS-8 and ETS-2.

We performed bench scale treatability studies and simulations to enable Arcadis to evaluate filter press, centrifuge and gravitational dewatering technologies. We evaluated the insitu sludge samples with a variety of test for physical data. The physical data was used for our evaluation of the different dewatering technologies, volume reductions and additives required for processing.

Before performing the testing and simulations the insitu sludge samples were thoroughly mixed. Each sample was mixed using an electrically powered drill and a five gallon paint mixer for a duration of 5 minutes each. The mixing achieved a homogenous mix of the flowable sludge, settled solids and clumped solids. The samples were remixed as needed before each test. No dilution was needed for mixing and no dilution was used for any testing.

As requested, the dewatering test and simulations included Baroid, plate and frame, centrifuge, and stacking (i.e.gravity drainage or gravitational dewatering). Each technology study used a variety of chemicals, materials and dosages to arrive at the best results. Below or the results of each sample:

The Baroid equipment was used in conjunction with various filter media and chemical treatments to obtain an indication for the best result for the recessed chamber filter press simulation. Various dosages of diatomaceous earth, lime, ferric sulfate and combinations were used in the Baroid testing. All samples were also tested using no additives. Decisions were based on cake hardness, estimated % solids of filter cake, estimated minimal filter aid required, time required for dewatering/filtering, cleanliness of filter cloth and cleanliness of filtrate/effluent. Our estimated best results were achieved by adding and mixing 0.5% by weight hydrated lime with the insitu sludge samples. Similar results were achieved on all 4 samples. Filter cake was firm, filter cloth remained clean and filtrate/effluent was good.

Basically all samples showed the ability to be filter pressed using D,E., lime, ferric and most combinations mentioned. Also, all samples showed the ability to be filter pressed without using any filter aid, although the cake was sticky which left filter cloth dirty.

Filter press technology achieved the best results when considering volume and mass reduction. Also as expected, filter press technology achieved the best effluent of the dewatering technologies tested.

The filter press simulation samples were achieved using the insitu sludge, no dilution and 0.5% by weight of hydrated lime added. The filter cake definitely would pass paint filter testing. The filter cake was firm which should achieve a good compressive strength and suspended solids percentage. All 4 samples IBS-2, IBS-4, IBS-8 and ETS-2 were very similar in the testing and simulations.

Centrifuge technology is a very good candidate however the solids content would be lower than that of a filter press. The initial centrifuge simulation was run without chemical addition. The solids phase would definitely pass paint filter test but the centrate/effluent was not as clean as when polymer was not used.

The addition of polymer to enhance the solids/liquids separation process showed positive results in the centrate/effluent. The lab studies show a good two phase separation with very clean water. A minimal amount of light solids particles is noticed in the liquid phase (centrated/effluent).

The samples were jar tested for polymer dosage using cationic and anionic polymers of various charges (low, medium and high charge). The high charge cationic polymer showed the best estimated results based on solids percentage and cleanliness of the centrate/effluent.

Again, all 4 samples IBS-2, IBS-4, IBS-8 and ETS-2 were very similar in the testing and simulations.

Gravity Drainage (gravity dewatering/stacking)

Based upon the Arcadis recommended procedure for the "Stacking Simulation", this dewatering process also shows some positive results. The final solids phase from the study will pass the paint filter test without additional solidification. The liquid phase/effluent contained a reasonable amount of suspended solids. An addition of polymer could enhance solids settling and clean up the effluent.

Again, all 4 samples IBS-2, IBS-4, IBS-8 and ETS-2 were very similar in the testing and simulations.

This material (all 4 samples) showed positive signs of dewatering by all the tested technologies. All 4 samples showed very similar dewatering characteristics.

Once again, thank you for this opportunity to be of service to you. We look forward to your review of this testing study. Should you have any questions or require additional information, please do not hesitate to contact us.

For TMA Environmental

Jody Elisar Business Development Manager



TMA Environmental, Inc. p.O. Box 150 • Gonzales, LA 70707-0150 phone: 225.677,8800 • Fax: 225.673.9286

		comments		emuent phase	
TEST	results test performed	Bench Test	2 minutes @ 100%		
E31	47 % In Situ solids by volume (spin-out)	Report Test			pass paint filter
Po-c III sim	8.82 Lbs. per gallon in Situ	Rench Test (oven)		m	
	20% by weight % Solids In Situ	A/N		שווחפוור ווסו כוכפו מויכי כ	
	same In Situ Solids (Including Olik Grease)				
					albace 4 sy
IBS-2 centrifuge with	Distinction Confer	N/A		sample sent to Arcadis	sample sent to Arcaus
250 ppm cationic	_	Bench Test (oven)	T	very light solids	
polymer	31 % Solids by weight in care	clarity good, light solids	Z minutes (g. 100 /a	, n. (n.	
	DID DID THE STATE OF THE STATE				
IBS-2 centrifuge with	- Dilution Factor	N/A			
250 ppm anionic	29 % Solids in Cake	Bench Test (o'ch)	2 minutes @ 100%	light solid particles floating	
polymer	did not test % solids in effluent	Cally good, "gir calls			
					nace naint filter
IBS-2 Barold with no	- Dilution Factor	N/A		soft and sticks to cloth	pass paint inc
additives	An 1% Solids in Cake	Bench Test (over)	4 75 minutes @ 80 psi	slight dark color	
	Aid not test % solids in effluent	effluent has some sollos			
	1				
IRS-2 Baroid with 1.0% by		N/A	soldming of		
Alatomacous earth	Dilution Factor	Bench Test (oven)	good cake, clumples	close no viisible solids	clear, no visible solids
Wi. diatoria	52 % Solids in Cake		3.0 minutes @ 80 psi	lucal, ilo	
	did not test % solids in effluent				
10 0 10 mm		W.W.			
IBS-2 Barold With 0.5 % DY	Dilution Factor	CONTRACTOR OF THE PARTY OF THE	good cake, slightly soft	\neg	spilos aldision or region
wt. diatomacous earth	F	Bench Test (Over)	3.5 minutes @ 80 psi	clear, no visible solids	Clear, 10 vicini
		clarity good, light solles			
IBS-2 Barold with 1.0% by	Control Control	N/A	my system		good cake, very firm
wt hydrated ilme		Bench Test (oven)	good care, in a go os	clear no visible solids	
	=	clarity good, light solids	3.0 millutes @ co par		
	did not test % sollas in eliment				
114 /03 C 177		Vice			good cake, firm
IBS-2 Barold With U.5% by	Dilution Factor	A/N	sample sent to Arcadis		
wt. hydrated lime	Į	Bench Test (oven)	3.25 minutes @ 80 psi	i sample sent to Arcadis	
	10 Police 10, solide in effluent	clarity good			
	did not test at a source at a				
ine 2 Baroid with 1.0% by		AN	40		
Iborz Baron ime		Bench Test (oven)	fair cake, soft on top	slight dark color, no visible solids	olids
o new forric sulfate	-1	clarity good, light solids	4.0 minutes @ 60 ps	1	
2000	did not test % solids in emuent				



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solids phase

solids phase	eyes is		good cake, firm		sample sent to Arcadis	
effluent phase		slight color, no visible solids		sample sent to Arcadis 5.5 minutes @ 120 psi sample sent to Arcadis	sample sent to Arcadis	
	time for test	fair cake, soft on top 4.0 minutes @ 80 psi		sample sent to Arcadis 5.5 minutes @ 120 psi	4.5 days	
	comments	N/A Bench Test (oven) clarity good, light solids	677	Bench Test (oven)		
	results test performed	Dilution Factor - Dilution Factor - S	did not test 1% solids in eliment	+	did not test % solids in emuent	
1	. 0	IBS-2 Barold with 0.5% by wt. hydrated lime	Ø 0.5% tell 6 0.5%	IBS-2 filter press with 0.5% by wt. hydrated lime		IBS-2 gravity dewatering



TMA Environmental, Inc. p.o. Box 150 · Gonzales, LA 70707-0150 phone: 225.677.8800 · Fax: 225.673.9286

TEST IBS4 in situ				time for test	eminem priest	
insitu	results	test performed	Rench Test	2 minutes @ 100%		
	47 9 8.82 1	% In Situ solids by volume (spin-out) Lbs., per gallon In Situ	Bench Test Bench Test Bench Test (oven)			pass paint filter
	8% by weight	18% by weight % Solids In Situ				
Be. A contrifude with			NA		sample sent to Arcadis	sample sent to Arcadis
250 ppm cationic		Dilution Factor	Bench Test (oven)	/8007	light solids on bottom	
polymer	34 did not test	% Solids by weignt in cana % solids in effluent	clarity good, light solids	2 minutes @ 10076		
						Silveon A co to
IBS-4 centrifuge with		Control Control	N/A		sample sent to Arcadis	sample sent to Alcaula
250 ppm anionic	- 33	Wildfull ractor	Bench Test (oven)	2 minutes @ 100%	light solids floating	
polymer	did not test	% solids in effluent	clarity good, light sonds			
IBS-4 Barold with no		Distinct Earlor	NA		soft and slightly sticky	pass paint filter
additives	40	40 % Solids in Cake	Bench Test (oven) effluent has some solids	4.75 minutes @ 80 psi	sight dark color	
	did not test	% solina ili cilicalia				
be 4 Barold with 1.0% by			A Z			
wt. diatomacous earth		Dilution Factor	Bench Test (oven)	good cake, crumbles	clear, no viisible solids	clear, no visible solids
	00	50 % Solids in effluent		S.O IIIIIIdes @ co Fee		
	Old not lest	2000				
IRS-4 Barold with 0.5% by			A/N	And the state of t		
and diatomacous earth		_	Bench Test (oven)	good cake, slightly son	clear no visible solids	clear, no visible solids
	47 did not test	% Solids in effluent	clarity good, light solids	3.5 minutes @ oo por	7 [
IBS-4 Baroid with 1.0% by		Dilution Factor	N/A	good cake, firm		clear no visible solids
wt. hydrated lime	6 6 did not that	61 % Solids in Cake	clarity good, light solids	3.0 minutes @ 80 psi	clear, no visible solids	
	101					
IRS-4 Barold with 0.5% by		The state of the s	AN		good cake, firm	
wt. hydrated lime	, 6	62 % Solids in Cake	Bench Test (oven)	3.25 minutes @ 80 psi		clear, no visible solids
	did not test	1 1	Clainty good			
IBS-4 Baroid with 1.0% by			NIA	and the state of t		
wt. hydrated lime		Unution racio		A 5 minutes @ 80 psi	Т	slight dark color, no visible solids clear, no visible solids
& 0.5% ferric sulfate	did not test	٦	clarity good, light solids	4.0 11111111]	



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solids phase

effluent phase solids phase		clear, no visible solids	mil oder been	sample sent to Arcadis	sample sent to Arcadis sample sent to Arcadis
time for test		tair cake, soft on top			4,5 days
	comments	N/A Name of the solids	a facility	N/A Bench Test (over) clarity good	
	results test performed	Barold with 0.5% by drated lime	& 0.5% ferric suitate did not test % solids in effluent	IBS-4 filter press with 0.5% by Dilution Factor wt. hydrated lime 62 % Solids in Cake	IBS-4 dewatering did not test % solids in effluent gravity dewatering



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ating bottom bottom ating ating ating ating bottom ating ating bottom	The state of the s				officent phase	Solida pilias
Parcell Parc			comments	400%		
17 18 18 18 18 18 18 18			Bench Test	2 minutes @ 100%		
17% Se Solids in Situ Diudion Factor Diudion Fact	TEST		Reach Test			pass paint filter
17% 9, Solids in Situ Solids in Cake NA NA Solids in Cake Solids in Effuent NA Solids in Cake Solids in Effuent Solids in Effuen	IBS-8 in situ	8 90 Lbs. per gallon in Situ	Dooch Test (oven)		man at a close after spin-out	
Same In Situ Soids (Including Oil&Grease) Including Factor Including Oil&Grease) Including Oil&Grease			N/A		פתוחפות ווסר מכמו מונה	
Diution Factor Diution Factor NA			1,000			
19 28 % Solids in effluent 10 10 10 10 10 10 10 1						A Arcadis
10 10 10 10 10 10 10 10	ing a centrifude with		N/A		sample sent to Arcadis	Sample sem to vice
Mith 1.9% by Solids in effluent NiA Solids in effluent Solids in effluent NiA Solids in effluent S	Dono communication	Dilution Factor	Bench Test (oven)	70000	light solids on bottom	
The property of the color of	Zau ppm caucing	28 % Solids by weight in Cane	clarity good, light solids	2 minutes (@ 100 //	0	
Intringe with Dilution Factor NIA	polymer	1				
Parcy Parc						
Sample Color Col	ine o contribute with		N/A			
Troid with 1.0% by Solids in effluent Salids in effluent Salids in effluent Salids with 1.0% by Dilution Factor Dilution Fac	153-9 Cellunias	Dilution Factor	Bench Test (oven)	100%	light solids floating	
Told with no	Sol point amount	28 % Solids in Cake	clarity good, light solids	Z minutes @ 100%		
10	polymer					
10 10 10 10 10 10 10 10			477		23/200	
10% by 2% Solids in Cake Bench Test (oven) 10 minutes @ 80 psi 10 minutes	IBS-8 Barold with no	Τ	(00:00) PT T		Son and Signing Such	
Mile	additives	2	Bench Test (over)	6.0 minutes @ 80 psi	slight dark color	
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49 % Solids in Cake Clarity good, light solids 4.23 minutes @ 80 psi 6 by	and distortions of the		Bench Test (oven)	good cario de a 80 osi	Т	Clear, no visitie sone
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NIA Bench Test (oven) 3.5 minutes @ 80 psi cake firm						
Solids in Cake Bench Less (over) 3.5 minutes @ 80 psi 15 minutes 15 minut	IBS-8 Baroid with 1.0% by	Т	N/A	good cake, firm	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	clear, no visible solids
Olive Color Colo	wt. hydrated lime	19	Bench Test (over)	3.5 minutes @ 80 psi	clear, no visible sollus	
did not test 1 % solids in Eake Bench Test (oven) sample sent to Arcadis and Indian Factor Bench Test (oven) 4,0 minutes @ 80 psi did not test 1 % solids in effluent Indian Factor Bench Test (oven) 4,0 minutes @ 80 psi did not test 1 % solids in Cake soft on top did not test 1 % solids in Cake soft on top did not test 1 % solids in effluent clarity good, light solids 1 4,0 minutes @ 80 psi did not test 1 % solids in effluent clarity good, light solids 1 4,0 minutes @ 80 psi			Clarity good, light solice			
NIME		1				
- Dilution Factor Bench Test (oven) sample sent to Arcadus 56 % Solids in Cake clarity good 4,0 minutes @ 80 psi did not test % solids in effluent N/A fair cake, soft on top bilution Factor Bench Test (oven) fair cake, soft on top clarity good, light solids in Cake clarity good, light solids 4.0 minutes @ 80 psi			4/2		ain acced cake firm	
56 % Solids in Cake	IBS-8 Baroid With 0.5% by	Dilution Factor	(Rench Test (oven)	sample sent to Arca	and some sent to Arcadis	clear, no visible solids
did not test % solids in effluent in efflu	wt. hydrated lime	56 1% Solids in Cake	poor stirely	4.0 minutes @ 80 psi		
N/A Fair cake, soft on top Bench Test (oven) Fair cake, soft on top 56 % Solids in Cake Clarity good, light solids 4.0 minutes @ 80 psl did not test % solids in effluent clarity good, light solids 4.0 minutes @ 80 psl		Γ	clarity good			
NIA Fair cake, soft on top Bench Test (oven) Fair cake, soft on top Bench Test (oven) Fair cake, soft on top 56 % Solids in Effluent 64.0 minutes @ 80 psi 6		1				
- Dijution Factor Bench Test (oven) Tail cake, Sul on the State of the Solids in Effluent Carity good, light solids (4.0 minutes @ 80 psi clarity good) (4.0 minute	vd %0 t 41% bioses a con-		A/N	not no than extension to	T	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
ste 56 % Solids in Cake clarity good, light solids (4.0 minutes) & 5 p. minute	165-6 balond lime	Dilution Factor	Bench Test (oven)	Tall Cake, soit of the		olids clear, no visible solids
did not test % solids in effluent	o o col formir suifate	56 % Solids in Cake	clarity good, light solids	4.0 milities @ cc. pr	}	
	& 0.3% lettic summer	did not test % solids in effluent				



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solids phase				clear no visible solids				good cake, firm				sample sent to Arcadis	Sample services	
officent phase	ennem bligge								o A condition	5.5 minutes @ 120 psi sample sent to Arcaula			sample sent to Arcadis	
	time for test			fair cake, soft on top	4.0 minutes @ 80 psi				Sample Sent to Arcaula	5.5 minutes @ 120 psi			4.5 days	
	comments		A/X	Bonch Test (oven)	ploch, good light solids	Calify good, "gire come		N/A	Bench Test (oven)	Don'th' Good	Clairly Book			
		test performed		Dilution Factor	55 % Solids in Cake	did not test % solids in effluent			- Dilution ractor	62 % Solids in Cake	did not test % solids in effluent			
Constitution of the last of th		TEST	IBS.8 Barold with 0.5% by			& U.5% TEITIC SUITERE		IBS-8 filter press with 0.5% by	-		did not te		0 0	gravity dewatering



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F (L)	resuits	test performed	comments	2 minutes @ 100%		
E31		33 % In Situ solids by volume (spin-out)	Bench lest			
ETS-2 in situ	00 0	The ner gallon in Situ	Bench Test			pass paint filter
	1987 Francischt W. Solide in Situ	Solide In Situ	Bench Test (oven)		officent not clear after spin-out	
	same	In Situ Solids (Including Oil&Grease)	N/A			
ETS-2 centrifuge with		Diluina Cartor	N/A		and cont to Arcadis	sample sent to Arcadis
250 ppm cationic		Ullution ractor	Bench Test (oven)		Sample sell to Alcadio	
polymer	<u>ω</u>	% Solids by weight in Cake	clarity good, light solids	2 minutes @ 100%	light solids on pottolii	
	did not test	% solids in emuent	6 /			
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						
ETS-2 centrifuge with		Dilution Factor	N/A			
250 ppm anionic	24	24 % Solids in Cake	Bench Test (oven)		int colide floating	
polymer	did not test	% solids in effluent	clarity good, light solids	2 minutes @ 100%	Builder solles indentify	
ETC. 2 Baroid with no			V. 2			
LIGHT PRINCE		Dilution Factor	(TO 10) 1 1 1 1 1 1 1 1 1 1		soft and slightly sticky	
additives	39	39 % Solids in Cake	Bench Test (over)	4 75 minutes @ 80 psi	slight dark color	
	did not test	% solids in effluent	emilient nas sonne sonos			
ETS-2 Baroid with 1.0% by		Dilution Early	N/A	College Control of the Control of th		
wt. diatomacous earth			Bench Test (oven)	good cake, crunioles	oper on viisible solids	clear, no visible solids
	CC .	76 Solids in offlient		3.0 minutes @ oo psi	Clear, III and	
	ala nor test	200000				
vd %50 mith 0 5% by			Vita			
E 13-2 Barola Will Co.		Dilution Factor	N/A	acced cake slightly soft		
wt. diatomacous earth	55	55 % Solids in Cake	Bench Test (oven)	3 5 minutes @ 80 osi	clear, no visible solids	clear, no visible solids
	did not test	% solids in effluent	clarity good, light solids		1 Г	
14. 4 A0. h.						
ETS-2 Baroid With 1.0% by	-	Dilution Factor	N/A	my cake from		
wt. hydrated lime	5.	52 % Solids in Cake	Bench Test (oven)	3 0 minutes @ 80 psi	clear, no visible solids	clear, no visible solids
	did not test	% solids in effluent	clarity good, light solids			
vd %5 of the biorea c arra			VIII.			siberry of tree of
CIST Daloid with		Dilution Factor	C/M		good cake, firm	Sample sent to Alore
wt. nydrated lime	4	46 % Solids in Cake	Bench Test (over)	3 25 minutes @ 80 psi		clear, no visible solids
	did not test	% solids in effluent	clarity good		1 [
vers 2 paroid with 1 0% by	-		V. 1			
E13-2 Dailoid with		Dilution Factor	N/A	fair cake, soft on top		abiles claise.
wt. nydrated lille		48 % Solids in Cake	Bench Test (over)	4 0 minutes @ 80 psi	slight dark color, no visible solids clear, no visible solids	lids clear, no visible solids
2 0 5% terms stillate			STATE OF THE PARTY	()		



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solids phase

effluent phase solids phase		clear, no visible solids	7.0 minutes @ 120 psi sample sent to Arcadis sample sent to Arcadis 4.5 days sample sent to Arcadis sample sent to Arcadis
time for test		fair cake, soft on top 4.0 minutes @ 80 psi	7.0 minutes @ 120 psi 4.5 days
	comments	N/A Bench Test (oven) clarity good, light solids	N/A Bench Test (oven) clarity good
Execution Comments	results test performed	wt. hydrated lime 45 % Solids in Cake 8 0.5% ferric sulfate did not test % solids in effluent	wt. hydrated lime 5% by . Dilution Factor . Dilution Factor . Dilution Factor . Solids in Cake . Solids in effluent . Solids in effluent . ETS-2.
	TEST	ETS-2 Barold with 0.5 wt. hydrated lime & 0.5% ferric sulfate	eTS-2 filter press will wt. hydrated lime wt. hydrated lime ETS-2 gravity dewatering



Appendix G

Solidification Report



FUGRO CONSULTANTS, INC.

4233 Rhoda Drive Baton Rouge, Louisiana 70816

Tel: 225-292-5084 Fax: 225-292-8084

August 09, 2010

Mr. Craig Derouen Arcadis 10352 Plaza Americana Drive Baton Rouge, LA 70816

Re: Sludge Mix Design

Hercules, Inc. Hattiesburg, MS

Fugro Project Number: 04.55101011

Mr. Derouen:

We have completed the mix study of the onsite sludge of the referenced site. Attached are Tables 1 and 2 of our findings.

If you have any questions regarding this information, please contact me at (225) 292-5084.

It has been a pleasure servicing you and Arcadis on this project.

Sincerely,

George Perkins CMET Manager

GLP/kkb

Enclosure

Hercules, Inc. Solidification Study

Raw Sludge Data Table 1



ARCADIS

Hercules, Inc. - Hattiesburg, MS

Fugro Project Number: 04.55101011

Date:

7/22/2010

	Moisture Content (%) ¹	Specific Gravity	Bulk Density (pcf)	Paint Filter (P/F)	% Solids
Sludge Type	HE DANSELLES COLUMN	1.03	62.0	FAIL	12.8
ETS-2	87.2		61.0	FAIL	15.2
IBS-2	84.8	0.99		FAIL	16.2
IBS-4	83.8	1.03	62.5		10.0
IBS-8	90.0	1.01	63.0	FAIL	10.0

Raw Sludge After Dewatering

	Moisture Content (%) ¹	Type of Dewatering	Bulk Density (pcf)	Paint Filter (P/F)	% Solids
Sludge Type		Gravity	54.2	FAIL	16.1
ETS	83.9		53.2	PASS	23.8
ETS	76.2	Centrifuge	66.1	PASS	42.0
ETS	58.0	Filter Press	00.1	PASS	41.0
 IBS-4	59.0	Gravity			33.5
1BS-2	66.5	Gravity	56.7	PASS	
	52.0	Filter Press	61.7	PASS	48.0
1BS-2 1BS-2	65.5	Centrifuge	62.9	PASS	34.5

Note: ¹ Moisture content based on the total weight of sample

Hercules, Inc. Solidification Study

Sludge Reagent Data Table 2

fuceo

ARCADIS

Hercules, Inc. - Hattiesburg, MS

Date:

7/26/2010

Fugro Project Number: 04.55101011

Sludge	Mix Number	Reagent Type	Reagent (%)	Days Cured	Bulk Density (pcf) ¹	Compressive Strength (psi)	Paint Filter P/F	After 3 day cure P/F
Type	1-A	Portland Cement	5	3	58.5	0.264	Fail	Pass
	1-B	Portland Cement	5	7	58.5	0.64	Fail	Pass
	2-A	Portland Cement	10	3	61.0	1.78	Fail_	Pass
	2-A	Portland Cement	10	7	61	3.36	Fail	Pass
	3-A	Quick Lime	5	3	58.6	(2)	Fail_	Fail
	4-A	Quick Lime	10	3	60.4	(2)	Fail	Pass
		Quick Lime	10	7	60.4	0.61	Fail	Pass
	4-B	Fly Ash	15	3	61.3	(2)	Fail	Fail
	5-A	Fly Ash	25	3	68.7	0.320	Fail	Pass
	6-A		25	7	68.7	1.02	Fail	Pass
	6-B	Fly Ash	25	3	66.9	6.50	Pass	Pass
	7-A	Quick Lime	25	7	66.9	13.6	Pass	Pass
	7-B	Quick Lime	10	3	63.1	0.44	Fail	Fail
	8-A	Calciment	10	-	62.5	_	Fail	
	8-B	Calciment	20	3	69.1	3.54	Fail	Pass
	9-A 9-B	Calciment Calciment	20		69.7		Fail	

Notes:

(1) Bulk density at time of molding

(2) Slumped under own weight

(3) Reagent % is by volume

いいく といし ひこく

NL - NAPLJOII SW - Sample Wipe Other PINK - Retained by ARCADIS 543/02-23-10/1403 1. 40 mi Vial
2. 1 LAmber
3. 250 mi Plastic
5. Encore
6. 2 oz. Gass
7. 4 oz. Gass
9. 0x best
9. 0x consess
9. 0x consess 10.Other SE - Sediment SL - Studge A-Air Lab Work Order # REMARKS Matrix Key: SO - Soll W - Water T - Tissue G. Other. X Other Relinquished By Page L of L Printed Name: YELLOW - Lab copy ı 1 PARAMETER ANALYSIS & METHOD Special OAIOC Instructions(*): 52 h l CHAIN OF CUSTODY & LABORATORY Received By 11 ANALYSIS REQUEST FORM Firm/Courter. DateTime 1/1 WHITE -- Laboratory returns with results 1 1403 Crais Brown Relinquished By 6-23-70 Preservative
Fibered (*)
\$ of Containers
Container
Information $\tilde{7}$ <u>۲</u> **5**L 2000, NS24,0000, Matrix Cray galerace of greeded-us C) Not Intact Comp Grab Type (3 Distribution: Condition/Cooler Temp:_ Laboratory Information and Receipt

Cooler Custody Seal (*) C-17-10 /320 Sample Receipt 65 82 10-25-2 15-Am 251 02/2: □ Intact There is no bear 10% 500; 1 High Mighes M. Sangar Prince 100. LA 70816 Page (25 - 1 tot) Consideration ALCANIS 艺 Bend Results to: ER-2(60-21+ 16 ETS-2 (att A A Decome 20730026 CofC AR Form 01.12.2007 Sample ID pecial Instructions/Comments ☐ Cooler packed with los (<) ARCADIS Infrastructure, emironment, buildings £13-2 87

Appendix H

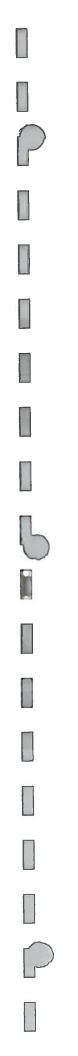
Feasibility Evaluation Matrix

Feasibility Evaluation Matrix, Sludge Characterization and Bench Scale Treatability Report, Hercules Incorporated, Hattiesburg, Mississippi.

Appendix H.

Technology	Centrifuge Dewatering with Off-Site Disposal	Technology Centrifuge Dewatering with Off-Site Filter Press with Off-Site Disposal Disposal	Gravity Dewatering with Off-Site Disposal	Gravity Dewatering with Off-Site Solidification with Off-Site Disposal Solidification with On-Disposal Site Capping	Solidification with On- Site Capping
Feasibility Criteria					Not effective. Does not
Effectiveness	Effective long term. Removes sludge of concern from site.	Effective long term. Removes sludge of concern from site.	Effective long term. Removes sludge of concern from site.	Effective long term. Kemoves studge of concern from site.	
Implementability	Electrical power source and specialty equipment required. Not weather dependent. Shortest duration. Implementable.	Electrical power source and specialty equipment required. Mechanical processing is not weather dependent. Should be faster than non-mechanical technologies. Shortest duration. Implementable.	No electrical power source required. Can be accomplished with standard construction equipment. May require construction of dewatering cell(s). Technology is weather dependent. Longest duration. Implementable.	No electrical power source required Can be accomplished with standard construction equipment. Reagent addition required. Technology is weather dependent. Moderate duration. Implementable.	Not implementable.

Ashland/OH3000,MS24/M/App H/bbn





Appendix I

IB Decommissioning Work Plan





Impoundment Basin Decommissioning Work Plan

Hattiesburg, Mississippi

20 August 2010

Craig A. Derouen, P.E. Senior Engineer

John Ellis, P.G.

Principal Scientist/Geologist

David R. Escudé, P.E.

Vice President/Principal Engineer

Impoundment Basin Decommissioning Work Plan

Hattiesburg, Mississippi

Prepared for:

Hercules Incorporated

Prepared by:
ARCADIS U.S., Inc.
10352 Plaza Americana Drive
Baton Rouge
Louisiana 70816
Tel 225 292 1004
Fax 225 218 9677

1 GA ZEU Z 10 301

Our Ref.: OH003000.MS24.00002

Date

20 August 2010

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	2.2	Dewatering Cell Construction	1		
	2,3	Dewatering Methodology	2		
	2.4	Backfill Activities	3		
	2.5	Site Restoration	3 3		
3.	Rep	Reporting			
4.	Pos	Post-Decommissioning			

Figures

- Site Location Map
- Potential Dewatering Locations 2

Impoundment Basin Decommissioning Work Plan

Hattiesburg, Mississippi

1. Introduction

ARCADIS U.S., Inc. (ARCADIS), submitted the *Sludge Characterization and Bench Scale Treatability Report* (C&T Report) to Hercules Incorporated, (Hercules). Hercules will submit the C&T Report to the Mississippi Department of Environmental Quality (MDEQ). The C&T Report presents the results of a bench scale treatability effort conducted to determine an effective and implementable strategy for decommissioning of the on-site impoundment basin (IB) located at Hercules' 613 West 7th Street facility in Hattiesburg, Mississippi (Figure 1). The C&T Report recommends that the IB sludge be gravity dewatered and disposed off site as a non-hazardous material and the IB backfilled to grade. In the event that another viable option is identified by the implementation contractors as more cost effective, Hercules may implement that option to decommission the IB. This work plan presents the methodology for implementing the decommissioning of the IB using gravity dewatering.

2. Decommissioning Method

2.1 Pre-Decommissioning Activities

Decommissioning of the IB must be approved by MDEQ. Hercules will work with MDEQ to obtain the necessary approvals.

Throughout the process of removing and dewatering the sludge, water originating from the IB will be discharged to the Publicly Owned Treatment Works (POTW) as needed. Hercules will communicate with the POTW so they are aware of the decommissioning activities.

Prior to implementation of the decommissioning, an approved waste disposal profile will be obtained from the Pine Belt Regional Landfill (landfill) using the current sludge data.

2.2 Dewatering Cell Construction

Treatment of the IB sludge will be accomplished through gravity dewatering. Dewatering cells will be constructed on available open space in the vicinity of the IB. Figure 2 shows proposed locations for up to three dewatering cells. It is anticipated that decommissioning can be implemented using two dewatering cells, with the third location identified as a contingency to be used only if required. The subgrade for each dewatering cell will be prepared by using soil from the existing backfill stockpile located

Ashland/OH3000.MS24/R/2/bbn

Impoundment Basin Decommissioning Work Plan

Hattiesburg, Mississippi

west of the IB. This material will be placed and graded at a 2% slope to promote drainage of the water from the sludge back to the IB. This drained water will flow directly to the IB from the West Cell, through a grated drain pipe directly to the IB from the South Cell, or via a concrete-lined ditch from the North Cell. The concrete-lined ditch discharges to the facility's industrial sewer. This sewer is currently covered by Hercules' permit.

A 24-inch soil berm will be built to surround each dewatering cell. The exterior and interior berms of the prepared subgrade will be lined with a 20-mil plastic liner (high density polyethylene [HDPE], or approved equivalent). A geosynthetic drainage composite (GDC) will be placed over the plastic liner. Both the plastic liner and GDC will be placed so that gravity drainage allows water released from the sludge to flow directly into the basin, grated drain piped to the IB, or the concrete-lined ditch, as appropriate. To protect the liner and GDC, 6 inches of rounded stone, or sand, will be placed over the GDC.

2.3 Dewatering Methodology

Sludge will be pumped or removed with a bucket excavator onto the upper surface in each dewatering cell until the cell is filled to within 6 inches of the top of the berm. The sludge will be allowed to dewater until it passes the Paint Filter Liquids Test (USEPA Method 9095A). Multiple applications of sludge to each cell will be necessary to dewater the entire volume of sludge in the IB. In the event that the primary decommissioning method cannot be implemented or is not effective at achieving sufficient dewatering to pass the Paint Filter Liquids Test, the partially dewatered IB sludge will be solidified with Portland cement or quick lime and transported off site for disposal. The dewatered sludge will be loaded for off-site transport to Pine Belt Regional Landfill, a municipal solid waste landfill site. Prior to disposal at the facility, an approved profile will be obtained.

Sludge will be removed from the IB until visual evidence indicates that all sludge has been removed and native soil remains on the bottom of the IB. It is anticipated that an additional 6 inches of native soil from the bottom of the IB will be removed, transported to, and disposed of at the landfill as part of this sludge removal process.

During dewatering, air monitoring will be conducted. In the event that nuisance odors are detected, an odor suppressant may be applied to the dewatering cell.

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2.4 Backfill Activities

Once it has been confirmed that sludge has been removed, the dewatering cells will be removed. All of the material above (stone or sand layer and GDC) and including the plastic liner will be disposed of at the landfill. The soils used to construct the subgrade and berms for the dewatering cells will be excavated and used as backfill material, along with any soil remaining in the stockpile west of the IB. Once these sources have been depleted, additional fill will be imported and placed in the IB. Dewatering of the IB will be conducted concurrently with backfilling, if necessary.

2.5 Site Restoration

The filled basin and dewatering cells will be graded to promote positive drainage to existing surface water conveyances. Disturbed areas will be seeded with a native grass species and fertilized. After fertilization, all project equipment will be demobilized from the site.

3. Reporting

Upon completion of decommissioning activities, a Decommissioning Certification Report will be submitted to MDEQ. The report will document the activities undertaken to decommission the IB and request no further action status for the IB sludge.

4. Post-Decommissioning

Post-decommissioning activities related to the IB sludge are not anticipated because of the removal action. The on-site groundwater monitor wells currently surrounding the IB will be left in place to facilitate future groundwater monitoring activities conducted under the Restrictive Use Agreed Order in place for this property.

