



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

May 9, 2011

4-RCRA

EXPRESS MAIL WITH CERTIFIED  
RETURN RECEIPT REQUESTED

Mr. Rodney S. Bolton  
Ashland Hercules Water Technologies  
5228 North Hopkins Street  
Milwaukee, Wisconsin 53209

SUBJ: Hercules, Inc.  
Hattiesburg, Mississippi  
EPA ID MSD 008 182 081  
Administrative Order under Section 3013(a) of RCRA  
Docket No.: RCRA-04-2011-4251

Dear Mr. Bolton:

Enclosed is an Administrative Order (Order) issued to Hercules, Inc. (Hercules), located in Hattiesburg, Mississippi, by the United States Environmental Protection Agency, Region 4. This Order is issued pursuant to Section 3013(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6934(a).

EPA has determined that the presence and/or release of hazardous waste, as defined in Section 1004(5) of RCRA, 42 U.S.C. § 6903(5), at the Hercules Hattiesburg facility may present a substantial hazard to human health or the environment. This determination is detailed in the enclosed Order. The Order requires that Hercules conduct monitoring, testing, analysis, and reporting to ascertain the nature and extent of such hazard by conducting the work described in Section V of the Order.

Compliance with the Order is required. Violation of the Order, or the failure or refusal to comply with any requirements of the Order, may result in EPA seeking enforcement of the Order in the U.S. District Court for the Southern District of Mississippi. In such action, and pursuant to Section 3013(e) of RCRA, 42 U.S.C. § 6934(e), EPA would request that the Court enforce compliance with the Order and assess a civil penalty of up to \$7,500 for each day during which such violation occurred, or is occurring, and for each day where there was, or is, a failure to comply.

The Order becomes effective ten (10) calendar days after the date of issuance, i.e., the date on which it is signed by the RCRA Division Director, and requires the submittal of a written Phase I Work Plan, as described in Section V of the Order, within 30 calendar days of issuance of the Order. Section XXIII of the Order provides Hercules with the opportunity to confer with EPA concerning the written proposals required under Section V of the Order. If Hercules desires a conference, a Hercules representative must

contact Colleen E. Michuda, Associate Regional Counsel, at the physical address or email address provided in Section XXIII of the Order, or by calling her at (404)562-9685, no later than 60 calendar days after the issuance of the Order. The scheduling of such a conference does not postpone or delay the effective date of the Order or any of the dates specified in the Order.

If you have any questions or comments, please contact Colleen E. Michuda, Associate Regional Counsel, at (404)562-9685.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Alan Farmer". The signature is fluid and cursive, with the first name "Alan" and the last name "Farmer" clearly distinguishable.

G. Alan Farmer  
Director  
RCRA Division

Enclosure

cc: Chris Sanders, MDEQ-ECED  
Jerry B. Banks, MDEQ - GARD