



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

DEC 9 2011

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

SUBJECT: Approval of Phase I Work Plan  
RCRA 3013(a) Administrative Order  
Docket No. RCRA-04-2011-4251  
Hercules, Inc.  
Hattiesburg, MS

Dear Ms. Murphy:

The U.S. EPA and the Mississippi Department of Environmental Quality (MDEQ) have extensively reviewed the Revised Phase I Sampling and Analysis Work Plan (SAWP), dated September 19, 2011, and the Phase I Addendum, dated November 15, 2011, which were submitted by Hercules, Inc. (Hercules) pursuant to the May 9, 2011, RCRA 3013(a) Administrative Order (AO). The EPA and MDEQ have determined that these documents, supplemented by the additional elements discussed in recent phone conversations (itemized below), satisfy the requirements of the AO and address the technical and programmatic issues that have been identified as priority concerns for Phase I of this investigation. The EPA, thus, approves these documents, as amended.

As Hercules implements the final (combined and amended) SAWP, the EPA would like to emphasize that throughout this AO investigation, a full characterization of the potential contaminants and migration pathways present at the Hercules site, including a comprehensive analysis of surface and subsurface characteristics and potential receptor populations, is of paramount concern. As such, the quality of the data and the timeliness of the analysis and submittal of such data is a priority for both the EPA and MDEQ. The EPA and MDEQ will be overseeing the work performed by Hercules and its consultant(s) to ensure that all approved protocols are followed and that data are submitted in a timely manner in accordance with the EPA-Region 4 electronic data delivery policy (Exhibit 5 to the AO). Particular priority will be given to private well and soil gas/vapor intrusion data and surface and subsurface delineation maps.

As discussed in previous phone conversations with your staff, the EPA requires that all work performed under this Phase I SAWP comply with the following elements: 1) Section 4-Preliminary Constituents of Concern (COCs) should be updated to reflect the September 27, 2011, discussion between the EPA and

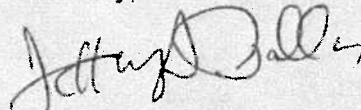
Hercules\*; 2) all equipment used to collect samples from all environmental media shall be cleaned as outlined in the SESD Operating Procedure for Field Equipment Cleaning and Decontamination, SESDPROC-205-R1 (See <http://www.epa.gov/region4/sesd/fbqstp/Field-Equipment-Cleaning-and-Decontamination.pdf>); 3) laboratory detection limits shall be equal to or less than the most up-to-date Regional Screening Levels (RSLs) for all COCs (see [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm)); and 4) up-to-date RSLs should be utilized for all data evaluations, including any ecological and human health risk assessments (the next EPA RSL update is expected in late December 2011).

Within ten (10) calendar days of this approval date, please submit four (4) paper copies and one (1) electronic copy of the final (combined and amended) Phase I SAWP to the EPA and to the MDEQ. The final (combined and amended) document should be updated to reflect the date of approval of the Work Plan and subsequent activities in Table 5.

In accordance with Paragraphs 77 and 92 of the AO, Hercules shall begin implementation of the approved Phase I SAWP within fifteen (15) calendar days of this approval letter. Noncompliance with the approved Phase I Work Plan or the schedule of implementation shall constitute noncompliance with the AO, and the provisions of Section XXIV of the AO will be enforced by the EPA.

Thank you for the diligence with which your staff has worked with the EPA and MDEQ during this process. Please contact Meredith Anderson, Corrective Action Project Manager, at 404-562-8608 or [anderson.meredith@epa.gov](mailto:anderson.meredith@epa.gov), if you have specific technical questions, or Colleen Michuda at 404-562-9685, or [michuda.colleen@epa.gov](mailto:michuda.colleen@epa.gov), if you have legal questions.

Sincerely,



Jeffrey T. Pallas, Chief  
Restoration and Underground Storage Tank Branch  
RCRA Division

cc: Melissa Collier, MDEQ  
John Ellis, Arcadis  
Tim Hassett, Ashland/Hercules  
Willie McKercher, MDEQ  
Chris Sanders, MDEQ  
Rick Sumrall, MDEQ  
Chris Wells, MDEQ

\*COCs for initial Phase I activities are: Appendix IX constituents for 100% of soil and sediment samples and 10% of surface water and groundwater samples; Appendix IX VOCs, SVOCs, and metals for the remainder of the surface water and groundwater samples.