HERCULES

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October 9, 2008

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

OCT - 9 2008

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,

Bruce N Hough

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