BUTLER | SNOW

March 9, 2011

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Hercules Inc.
Forrest Court,
Haz Waste MSD008182081
AI # 2022

Mr. Chris Wells
Senior Attorney
Enforcement and Compliance Division
Office of Pollution Control
Mississippi Department of Environmental Quality
Post Office Box 2261
Jackson, Mississippi 39225

Re: Response to January 12, 2011
Request for Information

Dear Mr. Wells:

In response to your information request to Hercules Incorporated ("Hercules"), we have investigated the matter by reviewing records and interviewing former employees. Listed below are your questions and Hercules' responses:

1) *Please describe, to the extent responsive information is available, the sequence by which the sludge disposal areas were filled. In particular, MDEQ requests that the Company identify, for each time that sludge was removed from the impounding basin, the location(s) in the sludge disposal areas where the sludge was deposited or over what areas it was spread. Alternatively, if such precise information is unavailable, please provide any information possessed by the Company which would delineate sludge deposited in the sludge disposal area over time, or at least differentiate (to the extent possible) between sludge disposed of in the 1970's and 1980's from that disposed of subsequent to 1990.*

Response: In gathering information related to this matter, we spoke with Charlie Jordan, the former Environmental Coordinator for the facility; Mr. Jordan worked at the facility for over forty years and served as the Environmental Coordinator for over twenty years. Mr. Jordan stated that, to the best of his recollection, there was no formal sludge disposal plan. Accordingly, the information we are able to provide as to which pits received sludge during various impoundment basin clean-outs is limited. Our investigation has not revealed any written documentation indicating where sludge from previous impoundment basin removal campaigns was deposited in the sludge pits. However, in our discussions with Mr. Jordan, he stated that to the best of his

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recollection, starting in the late 1980s/early 1990s sludge from the impoundment basin was used to fill the former "middle road" between the pits (this general area is highlighted for your reference in the enclosed attachment). We are continuing to look into this matter and should we uncover any further relevant information we will let you know.

2) *MDEQ requests that the Company identify, to the extent possible, the material contained in that area [upper right corner of map] and a description of the purpose of that particular portion of the disposal area.*

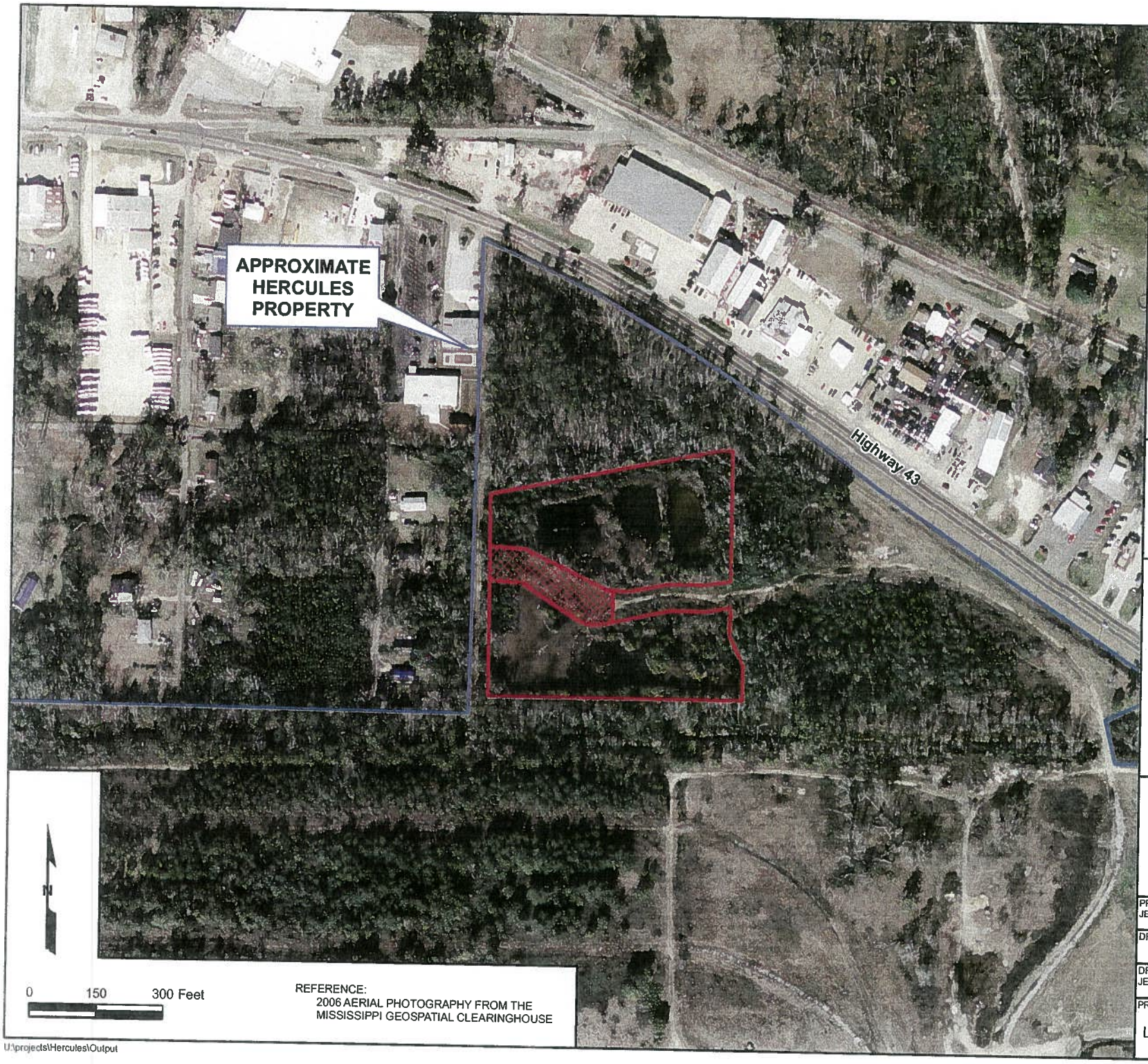
Response: Discussions with Mr. Jordan indicate that the area in question is a sludge pit that contains sludge from facility operations and was used in the same manner as the other sludge pits on site.

If you have any further questions concerning this matter, please let me know.

Sincerely
BUTLER, SNOW, O'MARA, STEPHENS & CANNADA, PLLC

Gary C. Rikard

Jackson 6196054v1



REFERENCE:
2006 AERIAL PHOTOGRAPHY FROM THE MISSISSIPPI GEOSPATIAL CLEARINGHOUSE

APPROXIMATE SLUDGE PIT AREA

INVESTIGATION AREA
Hattiesburg, Mississippi

Legend

Approximate "Middle Road Area"

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PROJECT MANAGER: JE	CHECKED BY: CD
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DRAWING BY: JEC	DATE: 02/24/2011
PROJECT NUMBER: LA002999.0001	FIGURE NUMBER: 2

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