From:	Meredith Anderson
To:	Timothy D Hassett/Plaza/NA/Herc@Ashland
Cc:	Colleen Michuda; Karen Knight; Willie_McKercher@deq.state.ms.us; Melissa_Collier@deq.state.ms.us
Subject:	Hercules, Hattiesburg, MS - DNAPL Assessment Plan - approval with modifications
Date:	08/10/2012 01:54 PM
For Follow Up:	Normal Priority.
Attachments:	DNAPL Assessment Plan_rev2.pdf

Tim,
Thank you for the DNAPL Assessment Plan submittal for the off-site area east of the Hercules property (attached below). The EPA and MDEQ have reviewed the plan and approve it for implementation within 15 days, in accordance with the May 2011 3013 Order, with the following modifications:

1) The groundwater monitoring well to be installed at the Lil' Teknon Learning Center property (located at 125 W. 8th St.) should be installed as a permanent monitoring well during the initial stage of this investigation. It should be located directly up-gradient from the main building and should be sampled and analyzed for Appendix IX constituents. Soil samples should also be collected during well installation and analyzed for Appendix IX constituents, in accordance with the approved Phase I Sampling and Analysis Work Plan (Phase I SAWP). The EPA will assist with acquiring site access for this well installation and sampling, if needed.

2.) As stated in the DNAPL Assessment Plan, the installation and sampling of groundwater monitoring wells will occur first in the eastern-most area, with analytical lab results received within 48-72 hours. The EPA and MDEQ interpret these well locations to include the following: Lil' Teknon Learning Center, L3-A, L2-A, south of L2-A, east of L1-A and L1-B, L4-A, L4-B, L4-C, and L4D.

3.) Additional wells should be installed and sampled upon receipt of analytical results in accordance with the decision process outlined in the
approved Phase I SAWP and upon the direction and approval of the EPA and MDEQ. Per the approved Phase I SAWP, additional wells will be needed to define the nature and extent of the groundwater plume if initial analytical results are above EPA RSLs and/or MS TRGs.

4.) Temporary wells will remain in place until Hercules is directed by the EPA and MDEQ to properly close the wells. The EPA and MDEQ will select wells to be converted to permanent wells for long-term monitoring purposes.

5.) All aspects of this investigation should be conducted in accordance with the approved Phase I SAWP.

Please call me at the number below if you have any questions about this approval. Thank you.

Meredith C. Anderson
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----- Forwarded by Meredith Anderson/R4/USEPA/US on 08/10/2012 01:20 PM -----

From: "Ellis, John" <John.Ellis@arcadis-us.com>
To: Meredith Anderson/R4/USEPA/US@EPA, "Willie_McKercher@deq.state.ms.us" <Willie_McKercher@deq.state.ms.us>
Cc: Timothy D Hassett <tdhassett@ashland.com>, "Melissa_Collier@deq.state.ms.us" <Melissa_Collier@deq.state.ms.us>, "Derouen,

Craig" <Craig.Derouen@arcadis-us.com>
Date: 08/03/2012 08:41 AM
Subject: Hercules, Hattiesburg, MS - DNAPL Assessment Plan

Meredith/Willie,

ARCADIS will implement a boring program to investigate the presence of Dense Non-Aqueous Phase Liquids (DNAPL) in the subsurface in the vicinity of the Hercules Incorporated site in Hattiesburg, Mississippi. The boring program will be conducted in general accordance with the procedures contained in the Revised Phase I Sampling and Analysis Work Plan approved for this site. The objective of the investigation is to define the extent of both the DNAPL and dissolved phase plumes in the southeast portion of the site (along the intersection of Providence and 8th Street). The plan below is based on feedback obtained from EPA and MDEQ on a previous investigation approach.

DNAPL was initially encountered at the boring AO-GP-28D location during implementation of the Revised Phase I Sampling and Analysis Work Plan. This boring is located offsite, near the southeast corner of the facility, adjacent to the Broome property. To further investigate the extent of the DNAPL, a geophysical survey was conducted. Based on the results of the geophysical survey, the boring locations shown on the attached figure are proposed to further the DNAPL investigative activities. Borings will be advanced to a depth equivalent to the base of the first water-bearing zone with a direct-push drill rig. Soil cores brought to the surface will be inspected by a geologist. Field screening results and the geology will be logged. Temporary wells will be installed within the groundwater bearing zone. In the event that DNAPL is encountered, the amount of DNAPL encountered in the temporary well will be noted. No groundwater samples will be collected from temporary wells with DNAPL. If no DNAPL is encountered, a groundwater sample will be collected and submitted to an analytical laboratory for the VOC and SVOC as specified in the Revised Phase I Sampling and Analysis Work Plan. Groundwater samples from the easternmost locations will be analyzed on a rapid turnaround (48 to 72 hour) in an effort to determine if additional delineation locations are required. Additional locations will be advanced until delineation is achieved or we progress to a parcel that does not have an executed access agreement. If a new access agreement is required, these activities will be completed as soon as possible to facilitate the delineation activities.

Please let us know if you have any questions or require additional information. Upon receiving your approval, we will schedule these activities.

Thanks,
John
