



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

DEC 17 2012

Tim Hassett
Ashland, Inc.
500 Hercules Road
8139/13
Wilmington, Delaware 19808

RE: Approval of Vapor Intrusion Evaluation and Proposed Sampling Plan, dated
November 27, 2012
RCRA 3013(a) Administrative Order, Docket No. RCRA-04-2011-4251
Hercules, Inc., Hattiesburg, MS
MSD 008 182 081

Dear Mr. Hassett:

Pursuant to the May 2011 RCRA 3013(a) Administrative Order, ARCADIS, consultant to Hercules, Inc., submitted the Vapor Intrusion Evaluation and Proposed Sampling Plan on November 27, 2012. This plan was prepared in response to EPA's request for follow-up groundwater and air sampling in the vicinity of 135 West 8th Street, located across from the Hercules-Hattiesburg facility.

As outlined in EPA's letter dated August 23, 2012, the EPA has determined that additional information is necessary to fully characterize the potential vapor intrusion exposure pathway east of the Hercules facility. The results of groundwater and air sampling to date in this area have not been conclusive regarding the presence or absence of a complete vapor intrusion pathway, and additional sampling and evaluation is necessary before this determination can be made. On October 29, 2012, the EPA, the Mississippi Department of Environmental Quality (MDEQ), Hercules, and ARCADIS discussed the necessary follow-up sampling for this area, and the above submittal presents further detail of these proposed sampling events.

The EPA and MDEQ have reviewed this plan, and the EPA **approves** it for implementation in accordance with all approved protocols for this site. Please provide a schedule for implementation, receipt of laboratory results, data evaluation, and reporting to EPA within 10 calendar days of this letter. Upon receipt and review of the data, the EPA may determine that additional sampling is necessary to further define any vapor intrusion risks posed by the site. This follow-up sampling may include additional groundwater sampling, soil gas profiling, preferential pathway analysis, and/or additional air sampling. It is a priority of the EPA that, if a complete vapor intrusion pathway is found to exist in this area, immediate and appropriate follow-up actions are to be implemented according to the EPA's direction. In addition, the EPA plans to be on-site during all or part of this work to provide technical oversight and respond to any community questions.

If you have any questions about the information contained in this letter, please contact Meredith Anderson of the RCRA Corrective Action Section staff at 404-562-8608, or by email at anderson.meredith@epa.gov. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Karen Knight". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

D. Karen Knight, CHMM
Chief, Corrective Action Section
RCRA Division

cc: Jerry Banks, MDEQ
Melissa Collier, MDEQ
John Ellis, ARCADIS
Willie McKercher, MDEQ
Chris Sanders, MDEQ
Nadine Weinberg, ARCADIS