

Hercules Incorporated Hercules Research Center 500 Hercules Road Wilmington, DE 19808-1599 Writer's Direct Dial: 302-995-3456

May 17, 2016

# **VIA ELECTRONIC MAIL**

Ms. Meredith Anderson RCRA Div/Corrective Action Section USEPA-Region 4 61 Forsyth Street, SW Mail Code: 9T25 Atlanta, Georgia 30303-8960

RE: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (April 2016)

USEPA Region IV, RCRA 3008(h) Order Docket # RCRA -04-2014-4201(b)

USEPA Region IV, RCRA 3013(a) Order Docket # RCRA -04-2011-4251

Dear Ms. Anderson:

This report summarizes the activities accomplished from April 1 to April 30, 2016, in order to comply with the RCRA 3008(h) and RCRA 3013(a) Orders for the former Hercules Hattiesburg Plant.

## TASKS INITIATED, CONTINUED, OR COMPLETED DURING APRIL 2016

- Solidified sludge material from Cell 5 in the Impoundment Basin (IB) was transported for treatment and disposal at Clean Harbor's facility in Deer Park, Texas (134 tons; 8 roll-off boxes), Clean Harbor's facility in Kimball, Nebraska (34 tons; 2 roll-off boxes), and Waste Management's facility in Emelle, Alabama (292.5 tons; 17 roll-off boxes).
- Approximately 17.5 tons (1 roll-off box) of soil bottom material from Cell 5 and 15 tons (1 roll-off box) of soil bottom material from Cell 8 were transported for disposal at Waste Management's facility in Emelle, Alabama.
- Approximately 82 tons (5 roll-off boxes) of IB clean-up material were transported for disposal at Waste Management's facility in Emelle, Alabama.
- Approximately 9 tons (1 roll-off box) of frac tank sediment material were transported for treatment and disposal at Clean Harbor's facility in Deer Park, Texas.
- Approximately 83 tons of spent vapor phase granular-activated carbon were transported for disposal at Republic Services' Little Dixie Landfill in Ridgeland, Mississippi (14 roll-off boxes).

- Seven loads of material were rejected by Waste Management's facility in Emelle, Alabama; therefore, the material was transported for treatment and disposal at Clean Harbor's facility in Deer Park, Texas.
- Approximately 340,500 gallons of water were pumped from ET-10 to the IB.
  Following receipt of analytical results, the water was treated with granular-activated carbon and discharged to the City of Hattiesburg sewer pursuant to the facility permit.
- Following receipt of analytical results for water from ET-18, approximately 122,900 gallons of water were treated with granular-activated carbon and discharged to the City of Hattiesburg sewer pursuant to the facility permit.
- Approximately 1,000 gallons of water from the on-site frac tank containing previous IB water were treated and discharged to the City of Hattiesburg sewer pursuant to the facility permit.
- Remobilization for solidification of sludge from ET-10 is pending evaluation of data and discussions with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ).
- Continued preparation of technical memoranda summarizing supplemental investigation activities.

### PROBLEMS AND DELAYS

- As of August 27, 2015, the Pine Belt Regional Landfill ceased accepting solidified sludge from the IB.
- Disposition of sludge from ET-10 is being evaluated before proceeding with work on these tanks.
- Disposition of sludge and native soil management are causing delays in backfilling/ restoration of the IB.

#### **TASKS PLANNED FOR MAY 2016**

- Conduct the first 2016 semiannual groundwater monitoring event for the Restricted Use Agreed Order (RUAO) and collect samples from five Hattiesburg monitoring wells.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables (EDDs).
- Continue preparation of technical memoranda summarizing supplemental investigation activities.
- Begin solidification of sludge in ET-18 for disposal.
- Submit a technical approach to the USEPA regarding management of sludge from ET-10 and provide clarifications to the previously approved Revised Interim Measures Work Plan and Interim Measures Design Report (100% Design).

## **COMMUNITY INVOLVEMENT**

None.

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## **PERSONNEL CHANGES**

None.

### **USEPA/MDEQ SUPPORT NEEDED**

- Review of the Draft Area #1 Monitoring Report (submitted 10/28/2015).
- Review of the Draft Hattiesburg Well Installation and Monitoring Report (submitted 12/18/2015).
- Review of the Draft Hattiesburg Well Network Monitoring Report (submitted 3/10/2016).
- Review of the Draft Groundwater Monitoring Report for Area #2 (submitted 3/25/2016).

Please call me if you have any questions regarding this Monthly Progress Report (302-995-3456).

Sincerely,

Timothy D. Hassett Project Coordinator

TDH Hburg3013\_April 2016

cc: J. T. Pallas – USEPA, Atlanta, GA (electronic)

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