



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

November 21, 2016

**VIA ELECTRONIC MAIL**

Mr. Maher Budeir  
Corrective Action Section  
Resource Conservation and Restoration Division  
USEPA-Region 4  
61 Forsyth Street, SW  
Mail Code: 9T25  
Atlanta, Georgia 30303-8960

RE: **Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (October 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 Mr. Budeir:

This report summarizes the activities accomplished from October 1 to October 31, 2016, in order to comply with Resource Conservation and Recovery Act (RCRA) 3008(h) and RCRA 3013(a) Orders for the former Hercules Hattiesburg Plant.

**TASKS INITIATED, CONTINUED, OR COMPLETED DURING OCTOBER 2016**

- Continued evaluation of potential options to address native soil under the Impoundment Basin (IB).
- Continued preparation of technical memoranda summarizing supplemental investigation activities.
- Initiated preparations for the 2016 second semiannual groundwater monitoring event for the Restricted Use Agreed Order (RUAO).
- Initiated preparations for the semiannual groundwater monitoring events for Area #1, Area #2, and the five Hattiesburg monitoring wells.

### **PROBLEMS AND DELAYS**

- On September 6, 2016, the U.S. Environmental Protection Agency (USEPA) responded to letters prepared by Hercules LLC dated May 13, 2016, and July 25, 2016, regarding the proposed path forward for the material in Tank ET-10. The USEPA noted some inconsistencies between the March 17, 2015, Final Interim Measures Design Report (100% Design) and the recent letters and concluded that the material in ET-10 should be managed as a K041 hazardous waste.
- Management options for native soil under IB are causing delays in backfilling/restoring the IB.

### **TASKS PLANNED FOR NOVEMBER 2016**

- Submit supplemental process description information for Tank ET-10 in response to correspondence from the USEPA dated September 6, 2016.
- Submit the Draft Technical Memorandum for Groundwater/Surface Water Interaction Evaluation.
- Submit the Final Area #2 Monitoring Report based on correspondence from the USEPA dated September 26, 2016.
- Conduct the 2016 second semiannual groundwater monitoring event for the RUAO.
- Conduct the semiannual groundwater monitoring events for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Continue to submit ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Participate in teleconferences with the USEPA and Mississippi Department of Environmental Quality (MDEQ) to discuss human health and ecological risk assessments.
- Evaluate demobilization while reviewing options for Tank ET-10 material.

### **COMMUNITY INVOLVEMENT**

- None.

### **PERSONNEL CHANGES**

- None.

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

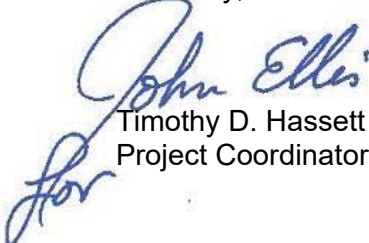
- Review of the Draft Chromium Speciation and AO-GP-26 Supplemental Sampling Report (submitted July 25, 2016).
- Review of the Draft Poly Pale™ Area Supplemental Investigation Report (submitted August 24, 2016).
- Review of the Draft Hattiesburg Well Network Monitoring Report for the May 2016 sampling event (submitted September 28, 2016).

Mr. Maher Budeir  
Page Three  
November 21, 2016

- Review of the Draft Dense Non-Aqueous Phase Liquid Supplemental Investigation Report (submitted September 28, 2016).

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

Sincerely,



Timothy D. Hassett  
Project Coordinator

TDH  
Hburg3013\_October 2016

cc: Mike Norman – USEPA, Atlanta, GA (electronic)  
Meredith Anderson – USEPA, Atlanta, GA (electronic)  
M. McGee-Collier – MDEQ, Jackson, MS (electronic)  
W. G. McKercher – MDEQ, Jackson, MS (electronic)  
H. Hudson – MDEQ, Jackson, MS (electronic)  
R. Sumrall – MDEQ, Jackson, MS (electronic)  
K. Woods – Hercules, Dublin, OH (electronic)  
J. Ellis – Arcadis, Baton Rouge, LA (electronic)