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December 19, 2017

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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (November 2017)

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 November 1 to November 30, 2017, 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 NOVEMBER 2017

- Continued solidification of Batch #6 in ET-10 Tank and hauled material to Pine Belt Regional Landfill (PBRL).
- Completed solidification of Batch #6 in the Impoundment Basin (IB) and hauled material to PBRL.
- Decanted excess water from solidification efforts. Water was then treated and discharged in accordance with the permit.
- Began removal of structure over the IB.
- Began demobilization of nonessential equipment.
- Participated in a conference call on November 13, 2017, with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) to discuss path forward to complete supplemental investigations and risk assessments.

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- Submitted the Final Groundwater/Surface Water Interaction Evaluation Report, dated November 27, 2017, addressing comments by the USEPA comments.
- Submitted the Final Historical Pit Investigation Work Plan, dated November 27, 2017.
- Submitted the Final Focused Human Health and Ecological Risk Assessment for 1,4-Dioxane in Greens Creek, dated November 27, 2017.
- Completed the 2017 second semiannual groundwater monitoring events for the Restricted Use Agreed Order (RUAO), Area #1, and Area #2.
- Completed the conversion or abandonment of temporary wells, soil leachability sampling, and the first quarterly groundwater monitoring event for the Poly Pale[™] Area.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

• None.

TASKS PLANNED FOR DECEMBER 2017

- Complete solidification of Batch #6 at ET-10 Tank followed by disposal at PBRL.
- Rinse ET-10 Tank in preparation for demolition.
- Complete removal of the structure over the IB.
- Begin backfilling the IB and installation of liner for the IB cap.
- Continue demobilization of nonessential equipment.
- Initiate data management and data evaluation for samples collected during semiannual groundwater monitoring events.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Participate in conference calls with the USEPA and MDEQ to discuss pending work and comments on human health and ecological risk assessments.

COMMUNITY INVOLVEMENT

• None.

PERSONNEL CHANGES

• None.

USEPA/MDEQ SUPPORT NEEDED

- Review the Draft Hattiesburg Well Network Monitoring Report documenting the May 2016 sampling event (submitted September 28, 2016).
- Review the Draft Hattiesburg Well Network Monitoring Report documenting the November/December 2016 sampling event (submitted April 21, 2017).

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- Review the Draft 2016 Second Semiannual Monitoring Report for Area #1 documenting the November/December 2016 sampling event (submitted June 16, 2017).
- Review the Draft 2016 Second Semiannual Monitoring Report for Area #2 documenting the November/December 2016 sampling event (submitted June 16, 2017).
- Review the Draft Former Commissary Building Vapor Intrusion Investigation Work Plan (submitted June 29, 2017).
- Resolve August 18, 2017, and September 13, 2017, USEPA comments on the Draft Identification of Exposure Domains for the Baseline Risk Assessment (submitted July 21, 2017).
- Resolve November 8, 2016, USEPA comments on the Draft DNAPL Supplemental Investigation Report (submitted on 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_November 2017

cc: Mike Norman – USEPA, Atlanta, GA (electronic) Meredith Anderson – USEPA, Atlanta, GA (electronic) M. McGee-Collier – MDEQ, Jackson, MS (electronic) Willie G. McKercher – MDEQ, Jackson, MS (electronic) Hunter Hudson – MDEQ, Jackson, MS (electronic) Kristina Woods – Hercules, Dublin, OH (electronic) John Ellis – Arcadis, Baton Rouge, LA (electronic)