



Hercules LLC
Hercules Research Center
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October 11, 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: **Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (September 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 September 1 to September 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 SEPTEMBER 2017

- Continued preparation of documentation to evaluate native soil and support closure of the Impoundment Basin (IB).
- Solidified Batch #4 of ET-10 material (1,881 tons) in the IB using lime kiln dust. Solidified material was disposed of at Pine Belt Regional Landfill (PBRL).
- Pumped Batch #5 of ET-10 material to the IB and began solidification.
- Recycled the water generated during solidification back to ET-10. This water combined with potable water from a nearby fire hydrant created a slurry of the remaining sludge.
- Continued to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.

- Submitted the 2017 First Semiannual Groundwater Monitoring Report for the Restricted Use Agreed Order (RUAO), dated September 1, 2017.
- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on September 19, 2017, to discuss path forward to complete supplemental investigations and risk assessments.
- Continued preparation of the 2017 First Semiannual Groundwater Monitoring Reports for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

- Hercules is currently in discussions with the USEPA and MDEQ regarding the path forward for IB native soils and final closure of the unit.

TASKS PLANNED FOR OCTOBER 2017

- Submit technical memorandum with preferred remedy to address native soil and support closure of the IB.
- Solidify Batch #5 of ET-10 material within the IB, followed by disposal at PBRL.
- Solidify remaining material in ET-10 for disposal and clean ET-10 tank.
- Continue to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.
- Submit the Draft 2017 First Semiannual Groundwater Monitoring Report for the five Hattiesburg monitoring wells.
- Submit the Draft 2017 First Semiannual Groundwater Monitoring Report for Area #1.
- Submit the Draft 2017 First Semiannual Groundwater Monitoring Report for Area #2.
- Submit the Final Groundwater/Surface Water Interaction Evaluation Report addressing USEPA comments.
- Submit the Final Historical Pit Investigation Work Plan.
- 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; path forward to complete the dense non-aqueous phase liquid (DNAPL) supplemental investigation; comments on human health and ecological risk assessments; and potential remedies for IB native soils.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

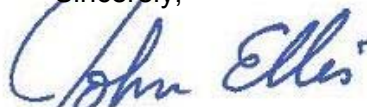
- None.

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).
- 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).
- Review the Draft Focused Human Health and Ecological Risk Assessment for 1,4-Dioxane in Greens Creek (submitted July 18, 2017).
- Review the Draft Identification of Exposure Domains for the Baseline Risk Assessment (submitted July 21, 2017).

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_September 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)
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