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April 20, 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

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RE: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (March 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 March 1 to March 31, 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 MARCH 2016

- Transported approximately 586 tons of solidified sludge material from Impoundment Basin (IB) Cell 8 for treatment and disposal at Clean Harbor's Deer Park, Texas, facility (35 roll-off boxes).
- Transported approximately 579 tons of solidified sludge material from IB Cell 5 for treatment and disposal at Clean Harbor's Deer Park, Texas, facility or Kimball, Oklahoma, facility (35 roll-off boxes).
- Transported of approximately 17.08 tons of solidified sludge material from IB Cell 5 for disposal at Clean Harbor's Lone Mountain, Oklahoma, facility (1 roll-off box).
- Transported approximately 72 tons of IB soil bottom material for treatment and disposal at Clean Harbor's Deer Park, Texas, facility (4 roll-off boxes).
- Evaluated of other disposal options for solidified sludge material from the facility.
- Pumped 44,100 gallons of water from ET-10 to the IB. Following receipt of analytical results, water was treated with granular activated carbon and discharged to the City of Hattiesburg sewer per the facility permit.

- Remobilization for solidification of sludge from ET-10 and ET-18 is pending evaluation
 of data and discussions with the U.S. Environmental Protection Agency (USEPA) and
 Mississippi Department of Environmental Quality (MDEQ).
- Continued working with TestAmerica Laboratories on analytical method for dioxathion (cis- and trans-) and dioxenethion analysis.
- Completed validation and evaluation of available data from supplemental investigation activities.
- Conducted a site meeting with USEPA and MDEQ on March 2, 2016.
- Submitted the Draft Hattiesburg Well Network Monitoring Report on March 10, 2016.
- Submitted the RUAO Semiannual Groundwater Monitoring Report on March 11, 2016.
- Submitted the Draft Groundwater Monitoring Report for Area #2 on March 25, 2016.
- Initiated preparation of technical memoranda summarizing supplemental investigation activities.

PROBLEMS AND DELAYS

- As of August 27, 2015, 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. This also delays backfilling/restoration of the IB.

TASKS PLANNED FOR APRIL 2016

- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables (EDDs).
- Continue preparation of technical memoranda summarizing supplemental investigation activities.
- Submit a technical approach to USEPA regarding management of sludge from ET-10 and provide clarifications and modifications to the previously approved Revised Interim Measures Work Plan and Interim Measures Design Report (100% Design).

COMMUNITY INVOLVEMENT

None.

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).

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• 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_March 2016

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

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