

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

June 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

RE: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (May 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 May 1 to May 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 MAY 2016

- Solidified sludge material from ET-18 using lime kiln dust (LKD) and polymer.
 Containerized sludge in roll-off boxes. The solidified sludge has not yet been shipped.
- Approximately 11 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 248,200 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 24,000 gallons of water were 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 tank DP-35, approximately 3,600 gallons of water were treated with granular-activated carbon and discharged to the City of Hattiesburg sewer pursuant to the facility permit.

- Remobilization for solidification of sludge from ET-10 is pending U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) review of a letter from Hercules dated May 13, 2016.
- Received review letter dated May 26, 2016, from MDEQ regarding the Draft Area #2 Monitoring Report.
- Received review letter dated May 26, 2016, from MDEQ regarding the Draft Hattiesburg Well Network Monitoring Report.
- Received review letter dated May 26, 2016, from MDEQ regarding the Restricted Use Agreed Order (RUAO) 2015 Second Semiannual Monitoring Report.
- Conducted the first 2016 semiannual groundwater monitoring event for the RUAO and collected samples from five Hattiesburg monitoring wells.
- 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 JUNE 2016

- Finalize and submit the Area #1 Monitoring Report.
- Finalize and submit the Hattiesburg Well Installation and Monitoring Report.
- Finalize and submit the Hattiesburg Well Network Monitoring Report.
- Begin validation and evaluation of data from the RUAO semiannual groundwater monitoring event and Hattiesburg monitoring wells.
- Begin preparation of the RUAO Semiannual Groundwater Monitoring Report.
- Begin preparation of the Hattiesburg Well Network Monitoring Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables (EDDs).
- Continue preparation of technical memoranda summarizing supplemental investigation activities.
- Participate in a meeting on June 9, 2016, with the USEPA and MDEQ in Atlanta, Georgia, to discuss project status.
- Continue solidification of sludge from ET-18 for disposal.
- Begin solidification of sludge from ET-10 upon approval of letter submitted to USEPA and MDEQ.

COMMUNITY INVOLVEMENT

None.

Ms. Meredith Anderson Page Three June 20, 2016

PERSONNEL CHANGES

None.

USEPA/MDEQ SUPPORT NEEDED

- Review of the Draft Groundwater Monitoring Report for Area #2 (submitted 3/25/2016; MDEQ comments received 5/26/2016).
- Review of Impoundment Basin Decommissioning Project Clarification of Operations and Path Forward correspondence (submitted 5/13/2016).

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

Sincerely,

Timothy D. Hassett Project Coordinator

TDH Hburg3013_May 2016

cc: J. T. Pallas – USE

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

M. Budeir – USEPA, Atlanta, GA (electronic)

M. McGee-Collier – MDEQ, Jackson, MS (electronic)

W. G. McKercher – MDEQ, Jackson, MS (electronic)

H. Hudson – MDEQ, Jackson, MS (electronic)

B. Weltner – Weltner Communications, Atlanta, GA (electronic)

K. Woods – Ashland/Hercules, Dublin, OH (electronic)

J. Ellis – Arcadis/Baton Rouge, LA (electronic)