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July 20, 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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (June 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 June 1 to June 30, 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 JUNE 2016

- Solidified nine batches of sludge material from ET-18 using lime kiln dust totaling 442 tons. Containerized sludge in roll-off boxes. The solidified sludge was shipped in July to Republic Little Dixie Landfill.
- Stored and sampled for laboratory analysis approximately 4,700 gallons of water generated from the stabilization of the ET-18 sludge. 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.
- Stored and sampled for laboratory analysis approximately 9,400 gallons of water generated from the stabilization of the ET-18 sludge.
- Installed sludge transfer line from ET-10 to the Impoundment Basin (IB) and pressure tested.
- Pressure washed inside of tank ET-19.
- Operated air treatment and continued air monitoring throughout the period of active stabilization. Shut down system following active stabilization.
- Decontaminated equipment prior to demobilization from the site.

- 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 June 7, 2016, from the USEPA regarding the Draft Area #1 Monitoring Report (dated October 28, 2015), the Draft Hattiesburg Well Installation and Monitoring Report (dated December 18, 2015), and the Draft Hattiesburg Well Monitoring Report (dated March 10, 2016).
- Participated in a meeting on June 9, 2016, with the USEPA and MDEQ in Atlanta, Georgia, to discuss project status.
- Initiated validation and evaluation of data from the RUAO semiannual groundwater monitoring event and 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.
- Management options for native soil under the IB are causing delays in backfilling/ restoration of the IB.

TASKS PLANNED FOR JULY 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.
- Finalize and submit the draft Technical Memorandum (Speciated Chromium).
- Finalize and submit the draft Technical Memorandum (Poly Pale™ Area).
- 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.
- Transportation and disposal of the sludge from ET-18 and demobilization until ET-10 sludge management plan is approved by the USEPA and/or MDEQ.
- Submittal of Tank ET-10 process description.

COMMUNITY INVOLVEMENT

None.

PERSONNEL CHANGES

Sydney Chan has been assigned by the USEPA as the Human Health Risk Assessor.

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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_June 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)

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