



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

October 17, 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: **Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (September 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 September 1 to September 30, 2016, in order to comply with Resource Conservation and Recovery Act (RCRA) 3008(h) and RCRA 3013(a) Orders for the former Hercules Hattiesburg Plant. On September 27, 2016, Hercules Incorporated changed its legal name to Hercules LLC (Hercules). The U.S. Environmental Protection Agency (USEPA) was provided prior written notice on August 8, 2016.

TASKS INITIATED, CONTINUED, OR COMPLETED DURING SEPTEMBER 2016

- Conducted a teleconference on September 20, 2016, with the USEPA and Mississippi Department of Environmental Quality (MDEQ) to discuss human health and ecological risk assessments.
- Submitted the Draft Hattiesburg Well Network Monitoring Report for the May 2016 sampling event, dated September 28, 2016.
- Submitted the Draft Dense Non-Aqueous Phase Liquid Supplemental Investigation Report, dated September 28, 2016.
- Continued preparation of technical memoranda summarizing supplemental investigation activities.
- Continued evaluation of potential options to address native soil under the Impoundment Basin (IB).

PROBLEMS AND DELAYS

- On September 6, 2016, the USEPA responded to letters prepared by Hercules dated May 13, 2016, and July 25, 2016, regarding the proposed path forward for the material in Tank ET-10.
- The USEPA noted some inconsistencies between the March 17, 2015, Final Interim Measures Design Report (100% Design) and the recent letters and concluded that the material in ET-10 should be managed as a K041 hazardous waste.
- Management options for native soil under IB are causing delays in backfilling/restoring the IB.

TASKS PLANNED FOR OCTOBER 2016

- Finalize and submit the Draft Technical Memorandum for the Groundwater/Surface Water Interaction Evaluation.
- Continue to submit ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Initiate preparation of the Draft Technical Memorandum for the Update to the Conceptual Site Model.
- Prepare a response to the letter received from the USEPA dated September 6, 2016, regarding Tank ET-10 material waste determination.
- Evaluate demobilization while reviewing options for Tank ET-10 material.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

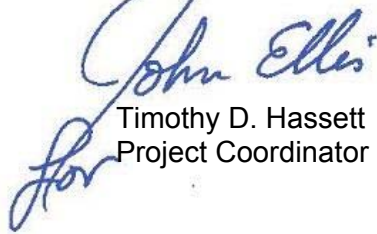
USEPA/MDEQ SUPPORT NEEDED

- Review of the Draft Groundwater Monitoring Report for Area #2 (submitted March 25, 2016; MDEQ comments received May 26, 2016).
- Review of the Draft Chromium Speciation and AO-GP-26 Supplemental Sampling Report (submitted July 25, 2016).
- Review of the Draft Poly Pale™ Area Supplemental Investigation Report (submitted August 24, 2016).
- Review of the Draft Hattiesburg Well Network Monitoring Report for the May 2016 sampling event (submitted September 28, 2016).
- Review of the Draft Dense Non-Aqueous Phase Liquid Supplemental Investigation Report (submitted September 28, 2016).
- Once submitted, review Hercules' response to the letter received from the USEPA dated September 6, 2016, regarding ET-10 material waste determination.

Mr. Maher Budeir
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Please call me at 302-995-3456 if you have any questions regarding this Monthly Progress Report.

Sincerely,

A handwritten signature in blue ink that reads "John Ellis". The signature is written in a cursive style. Below the signature, the name "John Ellis" is printed in a standard font.

Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_September 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)
H. Hudson – MDEQ, Jackson, MS (electronic)
R. Sumrall – MDEQ, Jackson, MS (electronic)
K. Woods – Hercules, Dublin, OH (electronic)
J. Ellis – Arcadis, Baton Rouge, LA (electronic)