



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

February 20, 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 (January 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 January 1 to January 31, 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 JANUARY 2017

- Continued evaluation of potential options to address native soil under the Impoundment Basin (IB).
- Continued revising the Draft Dense Non-Aqueous Phase Liquid (DNAPL) Supplemental Investigation Report.
- Continued preparation of technical memoranda summarizing supplemental investigation activities.
- Completed laboratory data management, review, and validation for the completed sampling events.
- Initiated preparation of the 2016 Second Semiannual Monitoring Report for the Restricted Use Agreed Order.
- Initiated preparation of the Semiannual Groundwater Monitoring Reports for Area #1, Area #2, and the five Hattiesburg monitoring wells.

PROBLEMS AND DELAYS

- On September 6, 2016, the U.S. Environmental Protection Agency (USEPA) responded to letters prepared by Hercules LLC dated May 13, 2016, and July 25, 2016, regarding the proposed path forward for the material in Tank ET-10. The USEPA noted inconsistencies between the March 17, 2015, Final Interim Measures Design Report (100% Design) and recent correspondence, and concluded that the material in ET-10 should be managed as a K041 hazardous waste. Hercules responded to USEPA and the Mississippi Department of Environmental Quality (MDEQ) with a letter dated December 13, 2016.
- No response has been received from the USEPA regarding the December 2016 letter.
- Management options for native soil under IB are causing delays in backfilling/restoring the IB.

TASKS PLANNED FOR FEBRUARY 2017

- Submit the Draft Technical Memorandum for the Groundwater/Surface Water Interaction Evaluation.
- Submit summary table and maps in support of DNAPL Supplemental Investigation Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Participate in teleconferences with the USEPA and MDEQ to discuss human health and ecological risk assessments.
- Participate in a teleconference with the USEPA and MDEQ to discuss Tank ET-10 material classification.
- Evaluate demobilization while reviewing options for Tank ET-10 material.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

USEPA/MDEQ SUPPORT NEEDED

- 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 the supplemental process description information for Tank ET-10 (submitted December 13, 2016).

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

Sincerely,



John Ellis



Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_January 2017

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)