



Hercules LLC
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March 15, 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 (February 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 February 1 to February 28, 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 FEBRUARY 2017

- Continued evaluation of potential options to address native soil under the Impoundment Basin (IB).
- Submitted summary table, maps, and recommendation for path forward in support of the Draft Dense Non-Aqueous Phase Liquid (DNAPL) Supplemental Investigation Report on February 9, 2017.
- Submitted the Draft Groundwater/Surface Water Interaction Evaluation Report on February 16, 2017.
- Participated in a teleconference on February 27, 2017, with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) to discuss site status.
- Continued preparation of the Draft Conceptual Site Model Update Report.

- Continued preparation of the 2016 Second Semiannual Monitoring Report for the Restricted Use Agreed Order (RUAO).
- Continued preparation of the Semiannual Groundwater Monitoring Reports for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Continued preparation of the Identification of Exposure Domains for the Baseline Risk Assessment.

PROBLEMS AND DELAYS

- On September 6, 2016, the 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 the USEPA and MDEQ with a letter dated December 13, 2016.
- Hercules is currently in discussions with the USEPA and MDEQ regarding the path forward regarding the IB native soils and ET-10 material disposal.

TASKS PLANNED FOR MARCH 2017

- Submit the 2016 Second Semiannual Monitoring Report for the RUAO.
- Submit the Semiannual Groundwater Monitoring Report for the five Hattiesburg monitoring wells.
- Continue preparation of the Semiannual Groundwater Monitoring Reports for Area #1 and Area #2.
- Continue preparation of the Identification of Exposure Domains for the Baseline Risk Assessment.
- Continue to submit ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Initiate preparation of a work plan for the vapor intrusion study for the Commissary building.
- Initiate preparation of a work plan for assessment of historical pits in former production areas.
- Participate in teleconferences with the USEPA and MDEQ to discuss assessments, pending work, human health and ecological risk assessments, Tank ET-10 material classification, and potential remedies for IB native soils.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

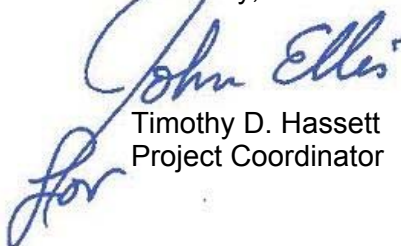
Mr. Maher Budeir
Page Three
March 15, 2017

USEPA/MDEQ SUPPORT NEEDED

- Review the Draft Chromium Speciation and AO-GP-26 Supplemental Sampling Report (submitted July 25, 2016).
- Review the Draft Poly Pale™ Area Supplemental Investigation Report (submitted August 24, 2016).
- Review 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).
- Review the summary table, maps, and recommendation for path forward in support of the Draft DNAPL Supplemental Investigation Report (submitted February 9, 2017).
- Review the Draft Groundwater/Surface Water Interaction Evaluation Report (submitted February 16, 2017).

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

Sincerely,



Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_February 2017

cc: Mike Norman – USEPA, Atlanta, GA (electronic)
Meredith Anderson – USEPA, Atlanta, GA (electronic)
M. McGee-Collier – MDEQ, Jackson, MS (electronic)
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