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May 22, 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 (April 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 April 1 to April 30, 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 APRIL 2017**

- Continued evaluation of potential options to address native soil under the Impoundment Basin (IB).
- Submitted letter to the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) presenting the remedial path forward regarding the Tank ET-10 material solidification, sampling, and disposal, dated April 28, 2017.
- Remobilized Clean Harbors to the facility in preparation for solidification and disposal of material in Tank ET-10.
- Submitted to the USEPA and MDEQ the 2016 Second Semiannual Monitoring Report for the Restricted Use Agreed Order (RUAO), dated April 21, 2017.
- Submitted to the USEPA and MDEQ the Draft Semiannual Groundwater Monitoring Report for the five Hattiesburg monitoring wells, dated April 21, 2017.

- Continued preparation of the Semiannual Groundwater Monitoring Reports for Area #1 and Area #2.
- Continued preparation of the Identification of Exposure Domains for the Baseline Risk Assessment.
- Continued preparation of a work plan for the vapor intrusion study for the Commissary building and assessment of historical pits in former production areas.
- Continued preparation of the Draft Conceptual Site Model Update Report.
- Initiated preparations for the 2017 first semiannual groundwater monitoring event for the RUAO.
- Initiated preparations for the 2017 first semiannual groundwater monitoring events for Area #1, Area #2, and the five Hattiesburg monitoring wells.

#### **PROBLEMS AND DELAYS**

- Hercules is currently in discussions with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) regarding the path forward for IB native soils and the Tank ET-10 material disposal.

#### **TASKS PLANNED FOR MAY 2017**

- Submit the Semiannual Groundwater Monitoring Reports for Area #1 and Area #2.
- Conduct the 2017 first semiannual groundwater monitoring event for the RUAO.
- Conduct the 2017 first semiannual groundwater monitoring events for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Continue preparation of the Identification of Exposure Domains for the Baseline Risk Assessment.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue preparation of a work plan for the vapor intrusion study for the Commissary building.
- Continue preparation of a work plan for assessment of historical pits in former production areas.
- Begin water management activities in ET-10 in preparation for material transfer.
- Upon approval from the USEPA and MDEQ, install a barrier within the IB (specifically Cells 2, 4, 5, 6, and 8), pump the Tank ET-10 material to the IB, and solidify and sample the first batch of the material. This effort will include restarting vapor mitigation and monitoring systems. Following receipt of laboratory analytical data, dispose of the solidified material and solidify additional batches.
- Participate in meeting with the USEPA and MDEQ to discuss pending work, human health and ecological risk assessments, Tank ET-10 material disposal, and potential remedies for IB native soils.

#### **COMMUNITY INVOLVEMENT**

- None.

#### PERSONNEL CHANGES

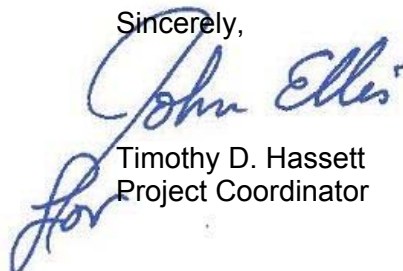
- None.

#### 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 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).
- Review the Draft Hattiesburg Well Network Monitoring Report for the December 2016 sampling event (submitted April 21, 2017).
- Review the letter presenting the path forward regarding the ET-10 material solidification, sampling, and disposal (submitted April 28, 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\_April 2017

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