



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

July 19, 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 (June 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 June 1 to June 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 JUNE 2017

- Preparing documentation to evaluate native soil and support closure of the Impoundment Basin (IB).
- Pumped additional non-disturbed water from ET-10 directly to the sanitary sewer, consistent with past practices.
- Pumped water from the IB through treatment and discharged to the sanitary sewer.
- Pumped water from the constructed wetland through treatment and discharged to the sanitary sewer. Some additional water from the constructed wetland was treated and containerized in a tank pending analysis for potential use to assist in pumping ET-10 material.
- Installed a 20-mil high-density polyethylene (HDPE) liner and poured 1 foot of flowable fill within Cells 2, 4, 5, 6, and 8 of the IB as a barrier in preparation for the solidification of ET-10 material within the IB.

- Transferred the initial batch (Batch #1) of material from ET-10 to the IB and solidified with lime kiln dust (LKD). Material was pumped from three locations at two depths at each location (six total locations) from ET-10.
- Staged Batch #1 on plastic sheeting adjacent to the IB and sampled material for waste characterization.
- Began transferring the second batch (Batch #2) of ET-10 material to the IB for solidification.
- Completed the 2017 first semiannual groundwater monitoring event for the Restricted Use Agreed Order (RUAO).
- Completed the 2017 first semiannual groundwater monitoring events for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Received a letter from the U.S. Environmental Protection Agency (USEPA) dated June 1, 2017, with comments on the Draft Poly Pale™ Area Supplemental Investigation Report (submitted August 24, 2016).
- Submitted the Draft 2016 Second Semiannual Monitoring Report for Area #1 dated June 16, 2017.
- Submitted the Draft 2016 Second Semiannual Monitoring Report for Area #2 dated June 16, 2017.
- Participated in a conference call with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) on June 26, 2017, to discuss pending work, human health and ecological risk assessments, and potential remedies for IB native soils.
- Submitted a work plan dated June 29, 2017, for the vapor intrusion study for the former Commissary building.
- Submitted the Final Chromium Speciation and AO-GP-26 Supplemental Sampling Report dated June 30, 2017.
- Received a letter from the USEPA dated June 30, 2017, with comments on the Draft Groundwater/Surface Water Interaction Evaluation Report (submitted February 16, 2017).
- Began preparation of the Focused Human Health and Ecological Risk Assessment for 1,4-dioxane in Greens Creek.
- Continued preparation of the Identification of Exposure Domains for the Baseline Risk Assessment.
- Continued preparation of the work plan for the assessment of historical pits.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

- Hercules is currently in discussions with the USEPA and MDEQ regarding the path forward for IB native soils and final closure of the unit.

TASKS PLANNED FOR JULY 2017

- Submit revised structure contour maps based on USEPA comments on the Draft DNAPL Supplemental Investigation Report.
- Submit the work plan for the assessment of historical pits.

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- Submit the Focused Human Health and Ecological Risk Assessment for 1,4-dioxane in Greens Creek.
- Submit the Identification of Exposure Domains for the Baseline Risk Assessment.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Begin preparation of the 2017 First Semiannual Groundwater Monitoring Report for the RUAO.
- Begin data validation and preparation for the 2017 First Semiannual Groundwater Monitoring Reports for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- Pending approval of the waste profile by Pine Belt Regional Landfill, load, transport and dispose of Batch #1 material from ET-10.
- Transfer and solidify additional batches of ET-10 material within the IB.
- Continue to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

USEPA/MDEQ SUPPORT NEEDED

- 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 a path forward in support of the Draft DNAPL Supplemental Investigation Report (submitted February 9, 2017).
- Review the Draft Hattiesburg Well Network Monitoring Report for the December 2016 sampling event (submitted April 21, 2017).

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" in a cursive script. Below the signature, the name "Timothy D. Hassett" and title "Project Coordinator" are printed in black text.

Timothy D. Hassett
Project Coordinator

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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)
Hunter Hudson – MDEQ, Jackson, MS (electronic)
Kristina Woods – Hercules, Dublin, OH (electronic)
John Ellis – Arcadis, Baton Rouge, LA (electronic)