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September 18, 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 (August 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 August 1 to August 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 AUGUST 2017**

- Continued preparation of documentation to evaluate native soil and support closure of the Impoundment Basin (IB).
- Disposed of dewatered material from the constructed wetland area (179 tons) at Pine Belt Regional Landfill (PBRL) as nonhazardous waste.
- Disposed of solidified ET-10 material (Batch #1 [51.5 tons] and Batch #2 [1,012 tons]) at PBRL as nonhazardous waste.
- Treated water generated from dewatering ET-10 material. Stored treated water in ET-18 and subsequently discharged following receipt of sampling results.
- Transferred rainwater that entered the IB following the flooding of Providence Road during a storm event to ET-10 and/or ET-18. The water underwent treatment prior to discharging to the sanitary sewer. No water or material flowed out of the IB.

- Solidified Batch #3 of ET-10 material (2,098 tons) in the IB using lime kiln dust. Solidified material was disposed of at PBRL.
- Began transferring Batch #4 of ET-10 material to the IB for solidification.
- Installed a bottom barrier in IB Cells #1, #3, and #7 using a 20-mil high-density polyethylene membrane and 12 inches of flowable fill. Access to these additional cells is expected to increase dewatering/solidification efficiency.
- Continued to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.
- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on August 11, 2017, to discuss path forward to complete the dense non-aqueous phase liquid (DNAPL) supplemental investigation, assessment of potential historical pits, and approach to finalize Poly Pale™ Area assessment.
- Submitted the Final Poly Pale™ Area Supplemental Investigation Report, dated August 22, 2017, addressing comments in correspondence from the USEPA (received June 1, 2017).
- Continued preparation of the 2017 First Semiannual Groundwater Monitoring Report for the Restricted Use Agreed Order (RUAO).
- Initiated preparation of the 2017 First Semiannual Groundwater Monitoring Reports for Area #1, Area #2, and the five Hattiesburg monitoring wells.
- 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 SEPTEMBER 2017**

- Submit technical memorandum with preferred remedy to address native soil and support closure of the IB.
- Transfer and solidify Batch #4 and Batch #5 of ET-10 material within the IB, followed by sampling and disposal.
- Begin cleaning ET-10 tank.
- Continue to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.
- Submit the 2017 First Semiannual Groundwater Monitoring Report for the RUAO.
- Submit the Draft 2017 First Semiannual Groundwater Monitoring Report for the five Hattiesburg monitoring wells.
- Continue preparation of the Draft 2017 First Semiannual Groundwater Monitoring Reports for Area #1 and Area #2.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.

- Participate in a conference call with the USEPA and MDEQ to discuss pending work; comments on the Draft Groundwater/Surface Water Interaction Evaluation Report (received June 30, 2017); path forward to complete the DNAPL supplemental investigation and human health and ecological risk assessments; and potential remedies for IB native soils.

#### **COMMUNITY INVOLVEMENT**

- None.

#### **PERSONNEL CHANGES**

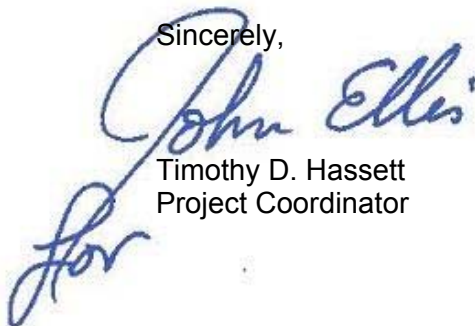
- None.

#### **USEPA/MDEQ SUPPORT NEEDED**

- Review the Draft Hattiesburg Well Network Monitoring Report documenting the May 2016 sampling event (submitted September 28, 2016).
- Review the Draft Hattiesburg Well Network Monitoring Report documenting the November/December 2016 sampling event (submitted April 21, 2017).
- Review the Draft 2016 Second Semiannual Monitoring Report for Area #2 documenting the November/December 2016 sampling event (submitted June 16, 2017).
- Review the Draft 2016 Second Semiannual Monitoring Report for Area #1 documenting the November/December 2016 sampling event (submitted June 16, 2017).
- Review the Draft Former Commissary Building Vapor Intrusion Investigation Work Plan (submitted June 29, 2017).
- Review the Draft Historical Pit Investigation Work Plan (submitted July 3, 2017).
- Review the Draft Focused Human Health and Ecological Risk Assessment for 1,4-Dioxane in Greens Creek (submitted July 18, 2017).
- Review the Draft Identification of Exposure Domains for the Baseline Risk Assessment (submitted July 21, 2017).

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

Sincerely,



Timothy D. Hassett  
Project Coordinator

Mr. Maher Budeir  
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cc: Mike Norman – USEPA, Atlanta, GA (electronic)  
Meredith Anderson – USEPA, Atlanta, GA (electronic)  
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