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November 17, 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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (October 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 October 1 to October 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 OCTOBER 2017

- Solidified Batch #5 of ET-10 material (1,728 tons) in the Impoundment Basin (IB) using lime kiln dust. Material was disposed of at the Pine Belt Regional Landfill (PBRL).
- Pumped a portion of Batch #6 ET-10 material to the IB until it was no longer pumpable. Began solidification in both ET-10 (after installing an access way) and the IB using lime kiln dust.
- Recycled water generated during solidification back to ET-10. Created a slurry of the remaining sludge using recycled water combined with potable water from a nearby fire hydrant.
- Decanted excess water from solidification efforts was treated and temporarily stored in ET-18.
- Continued to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work.

Mr. Maher Budeir Page Two November 17, 2017

- Submitted the Draft 2017 First Semiannual Groundwater Monitoring Report for Area #1, dated October 5, 2017.
- Submitted the Draft 2017 First Semiannual Groundwater Monitoring Report for Area #2, dated October 5, 2017.
- Submitted the Draft 2017 First Semiannual Groundwater Monitoring Report for the five Hattiesburg monitoring wells, dated October 12, 2017.
- Submitted technical memorandum with preferred remedy to address native soil and support closure of the IB, dated October 12, 2017.
- Participated in conference calls on October 2, October 16, and October 30, 2017, with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) to discuss path forward to complete supplemental investigations and risk assessments.
- Continued preparation of the Draft Conceptual Site Model Update Report.
- Initiated preparations for the 2017 second semiannual groundwater monitoring events for the Restricted Use Agreed Order (RUAO), Area #1, and Area #2.
- Initiated preparations for conversion or abandonment of temporary wells, soil leachability sampling, and the first quarterly groundwater monitoring event for the Poly Pale[™] Area.

PROBLEMS AND DELAYS

None

TASKS PLANNED FOR NOVEMBER 2017

- Solidify Batch #6 of ET-10 material within the IB and in ET-10, followed by disposal at PBRL.
- Clean ET-10 tank.
- Continue to operate vapor mitigation and monitoring systems associated with the IB and ET-10 work until solidification efforts are complete.
- Remove the structure over the IB once solidification efforts are complete in the IB.
- Begin backfilling the IB and procure liner for IB cap.
- Submit the Final Groundwater/Surface Water Interaction Evaluation Report addressing USEPA comments.
- Submit the Final Historical Pit Investigation Work Plan.
- Submit the Final Focused Human Health and Ecological Risk Assessment for 1,4-Dioxane in Greens Creek.
- Complete the 2017 second semiannual groundwater monitoring events for the RUAO, Area #1, and Area #2.
- Complete the conversion or abandonment of temporary wells, soil leachability sampling, and the first quarterly groundwater monitoring event for the Poly Pale[™] Area.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.

Mr. Maher Budeir Page Three November 17, 2017

• Participate in conference calls with the USEPA and MDEQ to discuss pending work and comments on human health and ecological risk assessments.

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 #1 documenting the November/December 2016 sampling event (submitted June 16, 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 Former Commissary Building Vapor Intrusion Investigation Work Plan (submitted June 29, 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_October 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) Hunter Hudson – MDEQ, Jackson, MS (electronic) Kristina Woods – Hercules, Dublin, OH (electronic) John Ellis – Arcadis, Baton Rouge, LA (electronic)