



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

September 18, 2018

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 2018)**

**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 through August 31, 2018, 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 2018

- Submitted the Hattiesburg Well Network Monitoring Report dated August 10, 2018, documenting the May 2016 sampling event for the uppermost sandy unit of the Hattiesburg Formation.
- Submitted the Hattiesburg Well Network Monitoring Report dated August 10, 2018, documenting the November/December 2016 sampling event for the uppermost sandy unit of the Hattiesburg Formation.
- Submitted the 2016 Second Semiannual Monitoring Report for Area #1 dated August 10, 2018, documenting the November/December 2016 sampling event for Area #1.
- Submitted the 2016 Second Semiannual Monitoring Report for Area #2 dated August 10, 2018, documenting the November/December 2016 sampling event for Area #2.

- Submitted the 2017 First Semiannual Monitoring Report for Area #1 dated August 10, 2018, documenting the May/June 2017 sampling event for Area #1.
- Submitted the 2017 First Semiannual Monitoring Report for Area #2 dated August 10, 2018, documenting the May 2017 sampling event for Area #2.
- Submitted the Hattiesburg Well Network Monitoring Report dated August 10, 2018, documenting the May 2017 sampling event for the uppermost sandy unit of the Hattiesburg Formation.
- Submitted the 2017 Second Semiannual Consolidated Monitoring Report dated August 10, 2018, including a summary of the November 2017 sampling event for the Restricted Use Agreed Order (RUAO), Area #1, and Area #2 programs.
- Initiated data evaluation for additional assessment activities (i.e., dense non-aqueous phase liquid [DNAPL] investigation, Drainage C sampling, and supplemental ecological surface soil sampling) completed in accordance with recommendations in the Phase I and II Investigation Report and subsequent discussions with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ).
- Continued preparation of the Draft Impoundment Basin (IB) & ET-10 Decommissioning Completion Report.
- Continued preparation of the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report.
- Continued preparation of the 2018 First Semiannual Consolidated Monitoring Report, including a summary of the May 2018 sampling event for the RUAO, Area #1, Area #2, and Hattiesburg Formation programs.
- Continued preparation of the Draft Conceptual Site Model Update Report.
- Conducted the fourth quarterly groundwater sampling event for the Poly Pale™ Area.
- Collected additional samples from the sludge pit area prior to geotechnical and treatability analyses of the soil.

PROBLEMS AND DELAYS

- None.

TASKS PLANNED FOR SEPTEMBER 2018

- Finalize the IB & ET-10 Decommissioning Completion Report.
- Finalize the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report.
- Finalize the 2018 First Semiannual Consolidated Monitoring Report, including a summary of the May 2018 sampling event for the RUAO, Area #1, Area #2, and Hattiesburg Formation programs.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Continue data evaluation for preliminary investigation at the sludge pits.

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- Participate in conference calls with the USEPA and MDEQ to discuss progress on supplemental investigations at the site and preparation of the human health and ecological risk assessments.
- Initiate preparation of the Historical Pit Investigation Report, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.
- Initiate preparation of the Drainage C and Surface Soil Supplemental Investigation Report, documenting the additional evaluation of soil quality along Drainage C and surface soil locations for the ecological risk assessment.
- Initiate revisions to the DNAPL Supplemental Investigation Report, incorporating new data and addressing comments by the USEPA on the draft version (dated September 28, 2016) and follow-up documentation provided via email on May 19, 2017.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

USEPA/MDEQ SUPPORT NEEDED

- Participate in conference calls to discuss progress on supplemental investigations at the site and preparation of the human health and ecological risk assessments.

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

TDH
Hburg3013_August 2018

cc: M. McGee-Collier – MDEQ, Jackson, MS (electronic)
Hunter Hudson – MDEQ, Jackson, MS (electronic)
Kristina Woods – Hercules, Dublin, OH (electronic)
John Ellis – Arcadis, Baton Rouge, LA (electronic)