



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

October 17, 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 (September 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 September 1 through September 30, 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 SEPTEMBER 2018

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on September 21, 2018, to discuss progress on supplemental investigations at the site and preparation of the human health and ecological risk assessments.
- Initiated revisions to the Dense Non-Aqueous Phase Liquid (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.
- Initiated preparation of the Historical Pit Investigation Report, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.

- Initiated data evaluation and preparation of the Poly Pale™ Area Monitoring Report, documenting the results of four quarterly groundwater sampling events and assessment of soil leachability potential.
- Initiated 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.
- Continued data evaluation for preliminary investigation at the sludge pits.
- 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 Restricted Use Agreement Order (RUAO), Area #1, Area #2, and Hattiesburg Formation programs.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

- None.

TASKS PLANNED FOR OCTOBER 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.
- Continue preparation of the Historical Pit Investigation Report, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.
- Continue 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.
- Continue preparation of 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.
- Continue preparation of the Poly Pale™ Area Monitoring Report, documenting the results of four quarterly groundwater sampling events and assessment of soil leachability potential.

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

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. There is also a small handwritten mark that looks like "for" written below the signature.

Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_September 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)