



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

November 19, 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 (October 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 October 1 through October 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 OCTOBER 2018**

- Participated in a meeting with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on October 11, 2018, to discuss site status, preparation of the human health and ecological risk assessments, and path forward for the project.
- Submitted the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report, dated October 30, 2018.
- Continued revisions to the Dense Non-Aqueous Phase Liquid (DNAPL) Supplemental Investigation Report, incorporating new data and addressing USEPA comments on the draft version (dated September 28, 2016) and follow-up documentation provided via email on May 19, 2017.
- Continued preparation of the Historical Pit Investigation Report, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.

- Continued preparation of the Poly Pale™ Area Monitoring Report, documenting the results of four quarterly groundwater sampling events and assessment of soil leachability potential.
- Continued 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.
- Began the treatability study on sludge pit samples.
- Continued preparation of the Draft Impoundment Basin (IB) and ET-10 Decommissioning Completion 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.
- Initiated preparations to conduct the 2018 second semiannual monitoring events for the RUAO, Area #1, and Area #2.

#### **PROBLEMS AND DELAYS**

- The 2018 second semiannual monitoring event was initiated on November 5, 2018. Monitoring Wells MW-34S and MW-34D were not found and appeared to have been destroyed.

#### **TASKS PLANNED FOR NOVEMBER 2018**

- Finalize the IB and ET-10 Decommissioning Completion 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.
- Finalize the Historical Pit Investigation Report, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.
- Finalize the Poly Pale™ Area Monitoring Report, documenting the results of four quarterly groundwater sampling events and assessment of soil leachability potential.
- 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 USEPA comments on the draft version (dated September 28, 2016) and follow-up documentation provided via email on May 19, 2017.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Continue with the treatability study on sludge pit samples.
- Participate in conference calls and meetings with the USEPA and MDEQ to discuss site status, preparation of the human health and ecological risk assessments, and path forward for the project.

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**COMMUNITY INVOLVEMENT**

- None.

**PERSONNEL CHANGES**

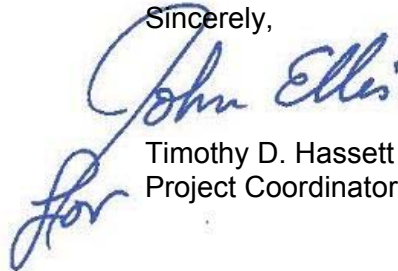
- None.

**USEPA/MDEQ SUPPORT NEEDED**

- Review the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report, dated October 30, 2018.
- Participate in conference calls to discuss site status, preparation of the human health and ecological risk assessments, and path forward for the project.

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" with a large flourish underneath that appears to be "for".

Timothy D. Hassett  
Project Coordinator

TDH  
Hburg3013\_October 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)