



Hercules LLC
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April 16, 2019

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 (March 2019)**

**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 March 1 through March 31, 2019, 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 MARCH 2019

- Received draft memos from the U.S. Environmental Protection Agency (USEPA) on March 15, 2019, with review comments on the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report (submitted on October 30, 2018).
- Participated in a meeting with the USEPA and Mississippi Department of Environmental Quality (MDEQ) on March 25, 2019, to discuss the comments on the second submittal for the human health and ecological risk assessments, the submittal of additional reports, and the path forward for the project.
- Finalized and submitted the Potential Historical Pit Investigation Report dated March 25, 2019, documenting the assessment of seven potential historical pits identified on recently produced aerial photography.

- Finalized and submitted the Poly Pale™ Area Monitoring Report dated March 25, 2019, documenting the results of four quarterly groundwater sampling events, the assessment of soil leachability potential, and the evaluation of the presence of dense non-aqueous phase liquid (DNAPL).
- Continued preparation of the 2018 Second Semiannual Consolidated Monitoring Report, documenting the November 2018 sampling event for the Restricted Use Agreement Order (RUAO), Area #1, and Area #2 programs.
- Continued revisions to 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.
- 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.
- Continued preparation of the Draft Impoundment Basin (IB) and ET-10 Decommissioning Completion Report.
- Continued preparation of the Draft Conceptual Site Model Update Report.
- Continued the treatability study on sludge pit samples.

PROBLEMS AND DELAYS

- None.

TASKS PLANNED FOR APRIL 2019

- Finalize the IB and ET-10 Decommissioning Completion Report.
- Finalize the 2018 Second Semiannual Consolidated Monitoring Report, documenting the November 2018 sampling event for the RUAO, Area #1, and Area #2 programs.
- Submit preliminary responses to the USEPA comments on the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report to obtain agreement on finalizing the document.
- 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.
- Initiate preparations to conduct the 2019 first semiannual monitoring events for the RUAO, Area #1, Area #2, Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.

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- Participate in conference calls with the USEPA and MDEQ to discuss the site status, preparation of the human health and ecological risk assessments, and the path forward for the project.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

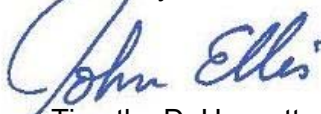
- None.

USEPA/MDEQ SUPPORT NEEDED


- Participate in conference calls to discuss the site status, preparation of the human health and ecological risk assessments, and the path forward for the project.

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_March 2019

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