



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

May 17, 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 (April 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 April 1 through April 30, 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 APRIL 2019**

- Initiated preparation of preliminary responses to the review comments provided by the U.S. Environmental Protection Agency (USEPA) on the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment report (submitted on October 30, 2018).
- Completed arrangements to conduct the 2019 first semiannual monitoring events for the Restricted Use Agreement Order (RUAO), Area #1, Area #2, the Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.
- Continued preparation of the 2018 Second Semiannual Consolidated Monitoring Report, documenting the November 2018 sampling event for the RUAO, Area #1, and Area #2 programs.
- 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 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 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 MAY 2019**

- 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.
- 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.
- 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.
- Conduct the 2019 first semiannual monitoring events for the RUAO, Area #1, Area #2, the Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.
- Participate in conference calls with the USEPA and Mississippi Department of Environmental Quality (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.

Mr. Maher Budeir  
Page Three  
May 17, 2019

**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,



John Ellis  
for  
Timothy D. Hassett  
Project Coordinator

TDH  
Hburg3013\_April 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)