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July 22, 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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u>
(June 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 June 1 through June 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 JUNE 2019

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on June 10, 2019, to discuss review comments on the 2018 First Semiannual Consolidated Monitoring Report (dated November 29, 2018), preparation of the human health and ecological risk assessments, and the path forward for the project.
- Received comments from the USEPA on June 13, 2019, regarding the preliminary responses (submitted May 1, 2019) to the review comments on the Draft Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report (submitted October 30, 2018).
- Initiated preparation of the 2019 First Semiannual Consolidated Monitoring Report documenting the sampling 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.

- Initiated preparation of the work plan to refine delineation of groundwater quality along the eastern property boundary as discussed with the USEPA and MDEQ.
- 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.

PROBLEMS AND DELAYS

None.

TASKS PLANNED FOR JULY 2019

- Submit the work plan to refine delineation of groundwater quality along the eastern property boundary.
- Finalize the IB and ET-10 Decommissioning Completion Report.
- Finalize 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.
- Finalize the Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report.
- 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 2019 First Semiannual Consolidated Monitoring Report.
- 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 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.

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PERSONNEL CHANGES

None.

USEPA/MDEQ SUPPORT NEEDED

• Participate in conference calls to discuss the site status, upcoming reports, 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.

Timothy D. Hassett Project Coordinator

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M. McGee-Collier – MDEQ, Jackson, MS (electronic) CC: Hunter Hudson – MDEQ, Jackson, MS (electronic) Robin Lampkin – Hercules, Dublin, OH (electronic)

John Ellis – Arcadis, Baton Rouge, LA (electronic)