

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

August 20, 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> (July 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 July 1 through July 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 JULY 2019

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on July 30, 2019, to discuss path forward for the project.
- Continued preparation of the work plan to refine delineation of groundwater quality along property boundaries in accordance with discussions with the USEPA and MDEQ.
- Initiated preparations to conduct the supplemental investigation of groundwater quality along property boundaries.
- Initiated revisions to the Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report, incorporating responses to review comments provided by the USEPA via memoranda dated March 5, 2019, and March 7, 2019, and more recently via email dated June 13, 2019.

- Continued preparation of the 2019 First Semiannual Consolidated Monitoring Report documenting the sampling events for the Restricted Use Agreement Order, Area #1, Area #2, the Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.
- 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 AUGUST 2019

- Submit the work plan to refine delineation of groundwater quality along the property boundaries.
- Complete the field activities for the delineation of groundwater quality along the property boundaries.
- 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 IB and ET-10 Decommissioning Completion Report.
- 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.

Mr. Maher Budeir Page Three August 20, 2019

COMMUNITY INVOLVEMENT

None.

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.

Sincerely,

Timothy D. Hassett Project Coordinator

TDH Hburg3013_July 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)