



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

September 19, 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 (August 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 August 1 through August 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 AUGUST 2019**

- Finalized and submitted the Supplemental Groundwater Assessment Work Plan dated August 1, 2019, describing the approach to refine the delineation of groundwater quality along property boundaries in accordance with discussions with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ).
- Received a comment letter from the USEPA dated August 5, 2019, related to the Poly Pale™ Area Monitoring Report submitted on March 25, 2019.
- Finalized and submitted the Drainage C and On-Site Surface Soil Supplemental Investigation Report dated August 13, 2019.
- Participated in a conference call with the USEPA and MDEQ on August 19, 2019, to discuss the path forward for the project and ongoing investigation efforts.
- Conducted the supplemental investigation of groundwater quality along property boundaries between August 19 and August 23, 2019.

- Resampled the monitoring wells screened within the uppermost sandy interval of the Hattiesburg Formation on August 22, 2019.
- Continued revisions to the Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report, incorporating responses to 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 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 SEPTEMBER 2019**

- Finalize the Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report.
- Finalize the IB and ET-10 Decommissioning Completion Report.
- Evaluate the supplemental investigation of groundwater quality data along property boundaries.
- Continue preparation of the 2019 First Semiannual Consolidated Monitoring Report, incorporating the resampling data for the monitoring wells screened within the uppermost sandy interval of the Hattiesburg Formation.
- 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 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.

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**COMMUNITY INVOLVEMENT**

- None.

**PERSONNEL CHANGES**

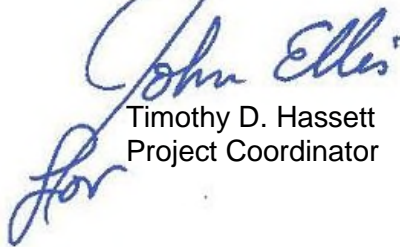
- None.

**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\_August 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)