



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

October 21, 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
(September 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 September 1 through September 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 SEPTEMBER 2019

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on September 11, 2019, to discuss the data from the supplemental investigation of groundwater quality along property boundaries, the comment letter from the USEPA dated August 5, 2019, related to the Poly Pale™ Area Monitoring Report submitted on March 25, 2019, and the path forward for the project.
- Finalized and submitted the Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment Report dated September 18, 2019.
- Continued 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.

- 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 OCTOBER 2019

- Finalize the IB and ET-10 Decommissioning Completion Report.
- Finalize 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.
- Finalize 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.
- Initiate preparations and complete the follow-up activities for the supplemental investigation of groundwater quality data along property boundaries.
- Initiate preparations for the 2019 second semiannual sampling events for the RUAO, Area #1, Area #2, and the Poly Pale™ Area monitoring programs.
- Initiate preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- 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.

PERSONNEL CHANGES

- None.

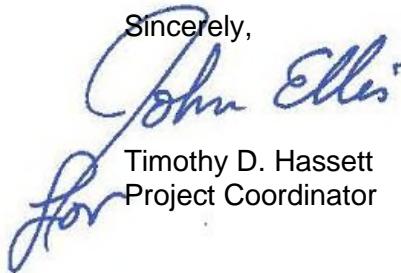
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USEPA/MDEQ SUPPORT NEEDED

- Participate in conference calls to discuss the site status, results of ongoing investigations, 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,

A handwritten signature in blue ink that reads "John Ellis". The signature is written in a cursive style. Below the signature, the name "John Ellis" is printed in a standard font.

Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_September 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)