



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

November 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 (October 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 October 1 through October 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 OCTOBER 2019**

- Participated in conference calls with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on October 1 and October 28, 2019, to discuss the data from the supplemental investigation of groundwater quality along property boundaries and the path forward for the project.
- Finalized and submitted the Supplemental Groundwater Assessment Work Plan dated October 16, 2019, describing the follow-up approach to refine the delineation of groundwater quality along property boundaries in accordance with discussions with the USEPA and MDEQ.
- Completed the follow-up activities for the supplemental investigation of groundwater quality data along property boundaries during the week of October 28, 2019.
- Completed preparations for the 2019 second semiannual sampling events for the Restricted Use Agreement Order (RUAO), Area #1, Area #2, and the Poly Pale™ Area monitoring programs.

- Initiated evaluation of the potential interim measures for the Poly Pale™ Area.
- Continued preparation of the 2019 First Semiannual Consolidated Monitoring Report, documenting the sampling events for the 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 NOVEMBER 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 data review for the follow-up activities for the supplemental investigation of groundwater quality data along property boundaries.
- Initiate preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- Conduct the 2019 second semiannual sampling events for the RUAO, Area #1, Area #2, and the Poly Pale™ Area monitoring programs.
- 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.
- Continue evaluation of the potential interim measures approach for the Poly Pale™ Area.
- 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**

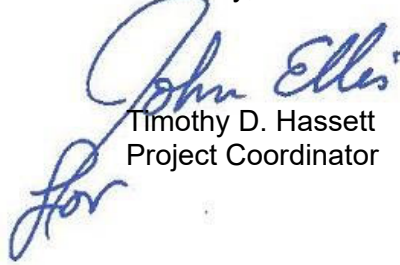
- None.

**USEPA/MDEQ SUPPORT NEEDED**

- Participate in conference calls to discuss the site status, 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,



Timothy D. Hassett  
Project Coordinator

TDH  
Hburg3013\_October 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)