



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

December 18, 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 (November 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 November 1 through November 30, 2019, in order to comply with the 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 NOVEMBER 2019

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on November 19, 2019, to discuss the data from the supplemental investigation of groundwater quality along property boundaries and the path forward for the project.
- Completed the 2019 second semiannual sampling event for the Restricted Use Agreement Order (RUAO), Area #1, Area #2, and the Poly Pale™ Area monitoring programs.
- Initiated preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- Initiated preparation of the Supplemental Groundwater Assessment Work Plan, describing follow-up activities to refine the delineation of groundwater quality along property boundaries in accordance with discussions with the USEPA and MDEQ.

- Continued evaluation of 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 DECEMBER 2019

- 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 IB and ET-10 Decommissioning Completion Report.
- 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.
- Complete the follow-up activities and continue the data review for the supplemental investigation of groundwater quality along property boundaries.
- Initiate data management and data review for the 2019 second semiannual sampling event for the RUAO, Area #1, Area #2, and the Poly Pale™ Area monitoring programs.
- Continue 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.
- 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.

Mr. Maher Budeir
Page Three
December 18, 2019

PERSONNEL CHANGES

- Mr. John Ellis resigned from Arcadis U.S., Inc. His last day with the company was November 26, 2019.

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,



for Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_November 2019

cc: M. McGee-Collier – MDEQ, Jackson, MS (electronic)
Hunter Hudson – MDEQ, Jackson, MS (electronic)
Robin Lampkin – Hercules, Dublin, OH (electronic)
Brian Burke – Arcadis, Tampa, FL (electronic)