



Hercules LLC
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January 17, 2020

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
(December 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 December 1 through December 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 DECEMBER 2019

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on December 9, 2019, to discuss the supplemental investigation of groundwater quality along property boundaries and path forward for the project.
- Finalized and submitted the Supplemental Groundwater Assessment Work Plan dated December 9, 2019, describing follow-up activities 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 along property boundaries during the week of December 16, 2019.
- Initiated data management and data review for the 2019 second semiannual sampling event for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and the Poly Pale™ Area monitoring programs.

- Initiated preparation of a Response to Comments letter documenting the conversations and agreements to address the review comments provided by the USEPA (dated October 17 and October 25, 2019) on the Final Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment report (submitted on September 18, 2019). The review comments will be addressed in the third submittal for the Baseline Risk Assessment.
- 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 evaluation of potential interim measures for the Poly Pale™ Area.
- 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 third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

- None.

TASKS PLANNED FOR JANUARY 2020

- 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.
- Finalize the Response to Comments letter documenting the conversations and agreements to address the review comments provided by the USEPA on the Final Data Evaluation and Assessment of Exposure and Toxicity for the Baseline Risk Assessment report.
- Initiate preparation of the 2019 Second Semiannual Consolidated Monitoring Report, summarizing the November 2019 sampling event for the RUAO, Area #1, Area #2, and the Poly Pale™ Area monitoring programs.
- Continue the data review and evaluation for the supplemental investigation of groundwater quality along property boundaries to identify follow-up activities.
- 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.

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- Continue to submit ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Continue evaluation of the potential interim measures approach for the Poly Pale™ Area.
- 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 path forward for the project.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- Mr. Jason Hughes (Birmingham, Alabama) joined the project team as Project Manager for Arcadis U.S., Inc.

USEPA/MDEQ SUPPORT NEEDED

- Participate in conference calls to discuss site status, results of ongoing investigations, upcoming reports, preparation of the human health and ecological risk assessments, and 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_December 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)