



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

March 16, 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 (February 2020)**

**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 February 1 through February 29, 2020, 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 FEBRUARY 2020

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on February 18, 2020, to discuss the supplemental investigation of groundwater quality along property boundaries, potential interim action for the Poly Pale™ Area, and the path forward for the project.
- Finalized and submitted the Supplemental Groundwater Assessment Work Plan dated February 18, 2020, describing follow-up activities to refine the delineation of groundwater quality along property boundaries in accordance with discussions with the USEPA and MDEQ.
- Finalized and submitted the 2019 First Semiannual Consolidated Monitoring Report dated February 26, 2020.
- Continued preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.

- 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 2019 Second Semiannual Consolidated Monitoring Report, documenting the sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and the Poly Pale™ Area.
- Continued evaluation of potential interim measures for the Poly Pale™ Area.
- Continued preparation of the Draft Conceptual Site Model Update Report.

PROBLEMS AND DELAYS

- None.

TASKS PLANNED FOR MARCH 2020

- 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 for the supplemental investigation of groundwater quality along property boundaries.
- Continue 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 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 submission of ongoing USEPA Data Archival and ReTrieval (DART) electronic data deliverables.
- Continue with the treatability study on sludge pit samples.
- Initiate preparation of a work plan to complete pilot testing activities for potential interim measures at 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.

PERSONNEL CHANGES

- None.


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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 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, appearing to read 'Timothy D. Hassett', written over the printed name.

for Timothy D. Hassett
Project Coordinator

TDH
Hburg3013_February 2020

cc: M. McGee-Collier – MDEQ, Jackson, MS (electronic)
Hunter Hudson – MDEQ, Jackson, MS (electronic)
Robin Lampkin – Hercules, Dublin, OH (electronic)
Jason Hughes – Arcadis, Birmingham, AL (electronic)