



Hercules LLC  
Hercules Research Center  
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Writer's Direct Dial: 302-995-3456

April 20, 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 (March 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 March 1 through March 31, 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 MARCH 2020**

- Completed the follow-up activities for the supplemental investigation of groundwater quality along property boundaries. Two additional temporary wells were installed and sampled in accordance with the Supplemental Groundwater Assessment Work Plan dated February 18, 2020.
- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on March 30, 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.
- 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 Impoundment Basin (IB) and ET-10 Decommissioning Completion Report.

- 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 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**

- Completion of essential activities continues during the Covid-19 pandemic. Significant delays have been minimized and the project team has been following guidelines in the Stay-at-Home Executive Order from the State of Mississippi Office of the Governor.

#### **TASKS PLANNED FOR APRIL 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.
- Prepare and submit a Supplemental Groundwater Assessment Work Plan to continue with follow-up activities to refine the delineation of groundwater quality along property boundaries in accordance with discussions with the USEPA and MDEQ.
- Continue 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.
- 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 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 site status, results of ongoing investigations, upcoming reports, 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\_March 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)