



Hercules LLC
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August 19, 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 (July 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 July 1 through July 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 JULY 2020

- Finalized and submitted the Dense Non-Aqueous Phase Liquid Supplemental Investigation Report dated July 29, 2020, incorporating new data and addressing comments by the U.S. Environmental Protection Agency (USEPA) on the draft version (dated September 28, 2016) and follow-up documentation provided via email on May 19, 2017.
- Initiated preparation of the 2020 First Semiannual Consolidated Monitoring Report, summarizing the May 2020 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, the Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.
- Continued preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale™ Area.
- Continued evaluation of current monitoring programs and development of an optimized monitoring program for long-term implementation.

- 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 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 RUAO, Area #1, Area #2, and the Poly Pale™ Area.
- Continued preparation of the Draft Conceptual Site Model Update Report.
- Completed data management and evaluation of analytical results for delineation of groundwater quality along property boundaries.

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 applicable health and safety guidelines during activities.

TASKS PLANNED FOR AUGUST 2020

- Finalize the 2019 Second Semiannual Consolidated Monitoring Report, summarizing the November 2019 sampling event for the RUAO, Area #1, Area #2, and Poly Pale™ Area monitoring programs.
- Finalize the preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale™ Area.
- Finalize the evaluation of current monitoring programs and development of an optimized monitoring program for long-term implementation.
- Finalize the IB and ET-10 Decommissioning Completion Report.
- Continue preparation of the 2020 First Semiannual Consolidated Monitoring Report, summarizing the May 2020 sampling events for the RUAO, Area #1, Area #2, the Poly Pale™ Area, and the uppermost sandy interval of the Hattiesburg Formation.
- 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.
- Participate in conference calls with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) to discuss the site status 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, 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_July 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)