

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

October 15, 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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (September 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 September 1 through September 30, 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 SEPTEMBER 2020

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on September 15, 2020, to discuss upcoming submittals and path forward for the project.
- Finalized and submitted the Supplemental Groundwater Investigation Report dated September 25, 2020, summarizing the assessment data for groundwater quality delineation along property boundaries.
- Continued preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- Continued evaluation of current monitoring programs and development of an optimized monitoring program for long-term implementation.
- Continued preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale[™] Area.

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- Continued 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 the Impoundment Basin (IB) and ET-10 Decommissioning Completion Report.
- 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 applicable health and safety guidelines during activities.

TASKS PLANNED FOR OCTOBER 2020

- Finalize the IB and ET-10 Decommissioning Completion Report.
- Finalize 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.
- Finalize preparation of the third submittal for the Baseline Risk Assessment Report, including the human health and ecological risk assessments for the site.
- Complete the evaluation of current monitoring programs and finalize the Long-Term Monitoring Optimization Plan.
- Initiate preparation for the second semiannual sampling event for the RUAO, Area #1, Area #2, and the Poly Pale[™] Area and first quarterly sampling of groundwater quality along the northeast portion of the site.
- Continue preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale[™] Area.
- 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 MDEQ to discuss the site status and path forward for the project.

COMMUNITY INVOLVEMENT

• Participated in a video conference with representatives of the City of Hattiesburg, USEPA, and MDEQ on September 16, 2020, to provide an update on site status.

PERSONNEL CHANGES

• None.

USEPA/MDEQ SUPPORT NEEDED

• Participate in conference calls to discuss site status, upcoming reports, human health and ecological risk assessments, and path forward for the project.

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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_September 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)