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September 21, 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> (August 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 August 1 through August 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 AUGUST 2020

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on August 4, 2020, to discuss the results of the supplemental investigation of groundwater quality along property boundaries and the path forward for the project.
- Finalized and submitted the 2019 Second Semiannual Consolidated Monitoring Report dated August 5, 2020, summarizing the November 2019 sampling event for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and Poly Pale[™] Area monitoring programs.
- Initiated preparation of the Supplemental Groundwater Investigation Report 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.
- Continued 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.
- 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 SEPTEMBER 2020

- Finalize the Supplemental Groundwater Investigation Report summarizing the assessment data for groundwater quality delineation along property boundaries.
- Finalize the IB and ET-10 Decommissioning Completion Report.
- Continue the evaluation of current monitoring programs and development of an optimized monitoring program for long-term implementation.
- Continue the preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale[™] Area.
- 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 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 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_August 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)