



Hercules LLC
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December 18, 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 (November 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 November 1 through November 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 NOVEMBER 2020

- Completed the 2020 second semiannual sampling event for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and Poly Pale™ Area monitoring programs.
- 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 DECEMBER 2020

- 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.
- Finalize the IB and ET-10 Decommissioning Completion Report.
- Complete the evaluation of current monitoring programs and finalize the Long-Term Monitoring Optimization Plan.
- Finalize the work plan to complete pilot testing activities for potential interim measures at the Poly Pale™ Area.
- Initiate data management and evaluation for the 2020 second semiannual sampling event, including the RUAO, Area #1, Area #2, and Poly Pale™ Area monitoring programs.
- Continue preparation of the Draft Conceptual Site Model Update Report.
- Continue submission of ongoing U.S. Environmental Protection Agency (USEPA) Data Archival and ReTrieval (DART) electronic data deliverables.
- Participate in conference calls with the USEPA and Mississippi Department of Environmental Quality (MDEQ) to discuss the site status and path forward for the project.

COMMUNITY INVOLVEMENT

- None.

PERSONNEL CHANGES

- None.

USEPA/MDEQ SUPPORT NEEDED

- Review the Final Dense Non-Aqueous Phase Liquid Supplemental Investigation Report submitted on July 29, 2020, incorporating new data and addressing comments by the USEPA on the draft version.
- Review the Supplemental Groundwater Investigation Report submitted on September 25, 2020, summarizing the assessment data for groundwater quality delineation along property boundaries.
- Participate in conference calls to discuss site status, upcoming reports, human health and ecological risk assessments, and the path forward for the project.

Mr. Maher Budeir
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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_November 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)