



Hercules LLC
Hercules Research Center
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Wilmington, DE 19808-1599
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January 19, 2021

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
(December 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 December 1 through December 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 DECEMBER 2020

- Finalized and submitted the 2020 First Semiannual Consolidated Monitoring Report dated December 23, 2020, 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.
- Initiated data management and evaluation of the 2020 second semiannual sampling event, including the RUAO, Area #1, Area #2, and Poly Pale™ Area monitoring programs.
- Continued preparation of a work plan to complete pilot testing activities for potential interim measures at the Poly Pale™ Area.
- 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 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 JANUARY 2021

- Finalize the work plan to complete pilot testing activities for potential interim measures at the Poly Pale™ Area.
- Finalize 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.
- Initiate preparation of the 2020 Second Semiannual Consolidated Monitoring Report, summarizing the November 2020 sampling events for 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
Page Three
January 19, 2021

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_December 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)