

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

February 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: <u>Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report</u> (January 2021)

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 January 1 through January 31, 2021, 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 JANUARY 2021

- Received the Final Quality Assurance Project Plan (Short Form) for Expanded Site Inspection (dated January 8, 2021) from the U.S. Environmental Protection Agency (USEPA) on January 11, 2021, describing the sampling plan to complete a Superfund evaluation at the site.
- Finalized and submitted the Draft Poly Pale[™] Area Pilot Test Work Plan dated January 12, 2021, describing the proposed methodology to assess air sparge/soil vapor extraction as a viable technology for the area.
- Submitted a technical memorandum dated January 22, 2021, with review comments on the USEPA Final Quality Assurance Project Plan (Short Form) for Expanded Site Inspection.
- Finalized and shipped the Draft Baseline Risk Assessment Report dated January 29, 2021, including the human health and ecological risk assessments for the site.

Mr. Maher Budeir Page Two February 19, 2021

- Initiated preparation of the 2020 Second Semiannual Consolidated Monitoring Report, summarizing the November 2020 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and Poly Pale[™] Area monitoring programs.
- 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 FEBRUARY 2021

- Finalize the IB and ET-10 Decommissioning Completion Report.
- Complete the evaluation of current monitoring programs and finalize the Long-Term Monitoring Optimization Plan.
- Continue 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 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 and the path forward for the project.

Mr. Maher Budeir Page Three February 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_January 2021

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)