

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

March 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> (February 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 February 1 through February 28, 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 FEBRUARY 2021

- Provided an update (conference call and presentation) on site status and path forward for the project to the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on February 4, 2021.
- Participated in a follow-up conference call with the USEPA and MDEQ on February 16, 2021, to discuss recent submittals to the agencies and next steps for the project.
- Continued 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 preparation of the Impoundment Basin (IB) and ET-10 Decommissioning Completion Report.
- Continued evaluation of current monitoring programs and development of an optimized monitoring program for long-term implementation.

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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 MARCH 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 submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Schedule preparation of presentation of the plan to address the sludge pits.
- Participate in conference calls with the USEPA and 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.
- Review the Draft Poly Pale[™] Area Pilot Test Work Plan submitted on January 12, 2021, describing the proposed methodology to assess air sparge/soil vapor extraction as a viable technology for the area.
- Review the Draft Baseline Risk Assessment Report submitted January 29, 2021, including the human health and ecological risk assessments for the site.
- Participate in conference calls to discuss site status and the 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

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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)