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April 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 (March 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 March 1 through March 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 MARCH 2021

- Coordinated a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on March 11, 2021, and presented the results of the Draft Baseline Risk Assessment for the site (submitted January 29, 2021).
- Participated in a follow-up conference call with the USEPA and MDEQ on March 19, 2021, to discuss recent submittals to the agencies and proposed interim corrective action measures for the project.
- Coordinated a conference call with the USEPA and MDEQ on March 31, 2021, and presented the proposed approach and rationale to address the sludge pits.
- 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.

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 APRIL 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.
- Submit the Final Poly Pale™ Area Pilot Test Work Plan, describing the proposed methodology to assess air sparge/soil vapor extraction as a viable technology for the area.
- Initiate preparation of the Draft Sludge Pit Remedial Design Work Plan, describing the proposed approach to address the sludge pits in accordance with the rationale presented during the March 31, 2021, conference call.
- Initiate preparation of the Draft 1,4-Dioxane Treatment Pilot Test Work Plan, describing the proposed methodology to assess an in-situ approach as a viable technology for treatment of 1,4-dioxane at the site.
- Initiate preparations for implementation of the pilot test for the Poly Pale™ Area.
- Initiate preparations for completion of the 2021 first semiannual monitoring event, including the RUAO, Area #1, Area #2, Poly Pale™ Area, and Hattiesburg Formation monitoring programs.
- 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.
- 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.

Mr. Maher Budeir
Page Three
April 19, 2021

- 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 Baseline Risk Assessment Report submitted on January 29, 2021, including the human health and ecological risk assessments for the site.
- Participate in conference calls to discuss the site status and 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_March 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)