



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

May 18, 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 (April 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 April 1 through April 30, 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 APRIL 2021**

- Coordinated a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on April 21, 2021, to discuss upcoming submittals to the agencies and proposed interim corrective action measures for the project.
- Submitted via email on April 27, 2021, the rationale and summary of the plan to collect confirmatory soil, sediment, and surface-water samples for laboratory analysis of total dioxathion to validate historical results and evaluate current site conditions using recently developed laboratory protocols.
- Finalized and submitted the *Impoundment Basin and ET-10 Decommissioning Completion Report* (dated April 28, 2021), summarizing the completed activities in accordance with approved work plans to decommission the former impoundment basin and tanks ET-10, ET-18, and ET-19 at the site.

- Finalized and submitted the *Long-Term Groundwater Monitoring Optimization Plan* (dated April 30, 2021), summarizing the detailed evaluation completed to develop an optimized program for the continued groundwater quality monitoring at the site.
- Finalized and submitted the *Final Poly Pale™ Area Pilot Test Work Plan* (dated April 30, 2021), describing the proposed methodology to assess air sparge/soil vapor extraction (AS/SVE) as a viable technology for the area.
- Initiated 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.
- Initiated preparation of the *Draft Sludge Pit Remedial Design Work Plan*, describing the proposed approach to address the sludge pits.
- Initiated preparation for implementation of the pilot test for the Poly Pale™ Area and completed installation of one air sparge well, one soil vapor extraction well, and three observation wells.
- Completed preparation and notifications for the 2021 first semiannual monitoring event, including the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Poly Pale™ Area, Northeast Plume Boundary Delineation, and Hattiesburg Formation monitoring programs.
- Continued preparation of the *2020 Second Semiannual Consolidated Monitoring Report*, documenting the November 2020 sampling events for the RUAO, Area #1, Area #2, and Poly Pale™ Area monitoring programs.

#### **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 MAY 2021**

- Finalize 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.
- Conduct the 2021 first semiannual monitoring event, including the RUAO, Area #1, Area #2, Poly Pale™ Area, Northeast Plume Boundary Delineation, and Hattiesburg Formation monitoring programs.
- Collect confirmatory soil, sediment, and surface-water samples for laboratory analysis of total dioxathion in accordance with the plan provided via email on April 27, 2021.
- Perform the AS/SVE pilot test for the Poly Pale™ Area.
- Continue 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.
- Continue preparation of the *Draft Sludge Pit Remedial Design Work Plan*, describing the proposed approach to address the sludge pits.
- Initiate preparation of the *Draft Thermal In-Situ Sustainable Remediation Pilot Test Work Plan*, describing the proposed methodology to assess the use of a sustainable thermal approach to expedite groundwater quality restoration at the site.

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- 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**

- Participated in a meeting at the site on April 14, 2021, with the City of Hattiesburg Mayor and City of Hattiesburg officials to discuss project status and potential beneficial reuse of the site.
- Coordinated with City of Hattiesburg contractors to support replacement of the sewer line along Short Columbia Street near Area #2 of the site.

#### **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 USEPA comments 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 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\_April 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)