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

June 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 (May 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 May 1 through May 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 MAY 2021

- Coordinated a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on May 11, 2021, to discuss upcoming submittals to the agencies and proposed interim corrective action measures for the project.
- Conducted 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.
- Collected 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.
- Performed the air sparge/soil vapor extraction (AS/SVE) pilot test for the Poly Pale™ Area in accordance with the *Final Poly Pale™ Area Pilot Test Work Plan* (dated April 30, 2021).

- Finalized and submitted the *Draft 1,4-Dioxane Treatment Pilot Test Work Plan,* dated May 27, 2021, 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 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.
- Continued preparation of the *Draft Sludge Pit Area Remedial Design Work Plan,* describing the proposed approach to address the sludge pits.
- 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 JUNE 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.
- Initiate data management and evaluation of analytical results for the 2021 first semiannual monitoring event, the total dioxathion confirmatory sampling, and the AS/SVE pilot test for the Poly Pale™ Area.
- Continue preparation of the *Draft Sludge Pit Area Remedial Design Work Plan*, describing the proposed approach to address the sludge pits.
- Continue 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.
- 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

- Followed up with the City of Hattiesburg Mayor and City of Hattiesburg officials regarding project status and potential beneficial reuse of the site.
- Continued working with City of Hattiesburg contractors to support replacement of the sewer line along Short Columbia Street near Area #2 of the site.

PERSONNEL CHANGES

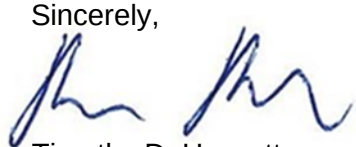
- None.

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.
- Review 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.
- 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_May 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)