

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

July 20, 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 (June</u> 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 June 1 through June 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 JUNE 2021

- Coordinated and participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on June 1, 2021, to discuss the site status and path forward for the project.
- Initiated data management and evaluation of analytical results for the 2021 first semiannual monitoring event conducted in May 2021, including the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Poly Pale[™] Area, Northeast Plume Boundary Delineation, and Hattiesburg Formation monitoring programs.
- Initiated data management and evaluation of analytical results for the confirmatory soil, sediment, and surface-water samples collected in May 2021 for total dioxathion analysis.
- Initiated data management and evaluation of analytical results for the air sparge/soil vapor extraction (AS/SVE) pilot test conducted in May 2021 for the Poly Pale[™] Area.

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- Continued 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 JULY 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 preparation of the Poly Pale[™] Area Pilot Test Completion Report, summarizing the results of the AS/SVE pilot study and proposing the next steps for the Poly Pale[™] area.
- Initiate preparation of the 2021 First Semiannual Consolidated Monitoring Report, summarizing the May 2021 sampling events for the RUAO, Area #1, Area #2, Poly Pale[™] Area, Northeast Plume Boundary Delineation, and Hattiesburg Formation monitoring programs.
- 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.

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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 continued groundwater quality monitoring at the site.
- Review the *Draft 1,4-Dioxane Treatment Pilot Test Work Plan* submitted on 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.
- 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_June 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)