



Hercules LLC
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August 23, 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 (July 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 July 1 through July 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 JULY 2021

- Coordinated and participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on July 8, 2021, to discuss preliminary observations regarding review of the *Draft Baseline Risk Assessment Report* submitted on January 29, 2021.
- Initiated preparation of the *2021 First Semiannual Consolidated Monitoring Report*, summarizing the May 2021 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Poly Pale™ Area, Northeast Plume Boundary Delineation, and Hattiesburg Formation monitoring programs.
- Initiated preparation of the *Poly Pale™ Area Pilot Test Completion Report*, summarizing the results of the air sparge/soil vapor extraction (AS/SVE) pilot study and proposing the next steps for the Poly Pale™ Area.
- 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 AUGUST 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.
- 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 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.
- Continue 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 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 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.

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- 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_July 2021

cc: Cassandra Johnson – MDEQ, Jackson, MS (electronic)
Hunter Hudson – MDEQ, Jackson, MS (electronic)
Robin Lampkin – Hercules, Dublin, OH (electronic)
Jason Hughes – Arcadis, Birmingham, AL (electronic)