



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

October 14, 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 (September 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 September 1 through September 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 SEPTEMBER 2021**

- Finalized and submitted the *2020 Second Semiannual Consolidated Monitoring Report* (dated September 3, 2021), documenting the November 2020 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, and Poly Pale™ Area monitoring programs.
- Finalized and submitted the *Draft Thermal In-Situ Sustainable Remediation Pilot Test Work Plan* (dated September 17, 2021), describing the proposed methodology to assess the use of a sustainable thermal approach to expedite groundwater quality restoration at the site.
- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) to discuss the site status and path forward for the project.
- Finalized and submitted the *Remedial Design Work Plan for the Sludge Pits* (dated September 28, 2021), describing the selected remedy and associated data that will be used to complete the voluntary remedial action for the sludge pit area.

- Continued 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.
- Continued 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.

### **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 OCTOBER 2021**

- Finalize 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.
- Complete preparations for the 2021 second semiannual monitoring event after the scope described in the *Long-Term Groundwater Monitoring Optimization Plan* (dated April 30, 2021) has been reviewed by the USEPA and MDEQ.
- 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.
- Review the *Draft Baseline Risk Assessment Report* submitted on January 29, 2021, including the human health and ecological risk assessments for the site.

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- Review the *Impoundment Basin and ET-10 Decommissioning Completion Report* submitted on April 28, 2021, summarizing the decommissioning activities completed in accordance with the *Revised Interim Measures Work Plan* (dated November 7, 2014) and the *Final Interim Measure Design Report* (dated March 17, 2015).
- 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.
- Review the *Draft Thermal In-Situ Sustainable Remediation Pilot Test Work Plan* submitted on September 17, 2021, describing the proposed methodology to assess the use of a sustainable thermal approach to expedite groundwater quality restoration at the site.
- Review the *Remedial Design Work Plan for the Sludge Pits* (dated September 28, 2021), describing the selected remedy and associated data that will be used to complete the voluntary remedial action for the sludge pit area.
- 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\_September 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)