



Hercules LLC  
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February 21, 2022

**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 (January 2022)**

**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 January 1 through January 31, 2022, 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 JANUARY 2022**

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on January 11, 2022, to present an overview of the site and discuss the status and path forward for the project. Attendees included personnel from the USEPA RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) groups.
- Finalized and submitted a *Response to Comments Letter* dated January 31, 2022, addressing review comments provided by the USEPA on November 4, 2021, regarding the *Long-Term Groundwater Monitoring Optimization Plan* (submitted on April 28, 2021).
- Completed preparations to conduct the fourth quarterly sampling event associated with the Northeast Delineation monitoring program, convert remaining temporary wells to permanent locations, and collect confirmatory samples of soil, sediment, and surface water for laboratory analysis of total dioxathion.

- Continued 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, and Hattiesburg Formation monitoring programs and the May 2021 (first quarterly) and September 2021 (second quarterly) sampling events for the Northeast Delineation monitoring program.

#### **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 FEBRUARY 2022**

- Finalize 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, Hattiesburg Formation, and Northeast Delineation (first quarterly sampling) monitoring programs. The document will also include the second quarterly sampling for the Northeast Delineation monitoring program conducted in September 2021.
- Conduct the fourth quarterly sampling event associated with the Northeast Delineation monitoring program, convert remaining temporary wells to permanent locations, and collect confirmatory samples of soil, sediment, and surface water for laboratory analysis of total dioxathion.
- Initiate preparation of the *2021 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2021 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ Area, and Northeast Delineation (third quarterly sampling) monitoring programs. The document will also include the fourth quarterly sampling for the Northeast Delineation monitoring program scheduled for February 2022.
- 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**

- The USEPA notified Hercules via email on December 14, 2021, that Diedre Lloyd will be the Remedial Project Manager for the project. Discussions regarding remedial alternatives, pilot studies, and/or interim measures should continue with the CERCLA group, including Diedre Lloyd and Sandra Bramble.

#### **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.

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- 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 *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 Measures Design Report* (dated March 17, 2015).
- Review the *Draft 1,4-Dioxane Treatment – Propane Biosparge 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 – 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.
- Review the *Poly Pale™ Area Pilot Test Completion Report* submitted on October 29, 2021, summarizing the results of the air sparge/soil vapor extraction pilot study and proposing the next steps for the Poly Pale™ 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\_January 2022

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)