



Hercules LLC
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March 17, 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 (February 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 February 1 through February 28, 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 FEBRUARY 2022

- Collected confirmatory samples of soil, sediment, and surface water for laboratory analysis of total dioxathion using the revised laboratory protocols for the analytical method to validate historical results.
- Conducted the fourth quarterly sampling event associated with the Northeast Delineation monitoring program for refinement of groundwater quality trends at the northeast boundaries of the known groundwater plumes.
- Finalized the conversion of remaining temporary wells in the monitoring network to permanent locations.
- Initiated preparation of the *2021 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2021 sampling events for the Restrictive Use Agreed Order (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 completed in February 2022.

- 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, and Hattiesburg Formation monitoring programs, as well as 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 MARCH 2022

- Finalize and submit 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.
- Continue 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 completed in February 2022.
- Continue submission of ongoing U.S. Environmental Protection Agency (USEPA) Data Archival and Retrieval electronic data deliverables.
- Participate in conference calls with the USEPA and Mississippi Department of Environmental Quality (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 with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) group 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.
- 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 *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.
- Review the *Response to Comments Letter* submitted on January 31, 2022, addressing the review comments provided by the USEPA on November 4, 2021, regarding the *Long-Term Groundwater Monitoring Optimization Plan* (dated April 28, 2021).
- 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_February 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)