



Hercules LLC
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June 20, 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 (May 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 May 1 through May 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 MAY 2022

- Attended the May 19, 2022, hybrid (virtual and in-person) public meeting hosted by the U.S. Environmental Protection Agency (USEPA) and the City of Hattiesburg to inform the community on the proposal by the USEPA to list the site in the Superfund Program's National Priorities List.
- Participated in conference calls with the USEPA and Mississippi Department of Environmental Quality (MDEQ) on May 11 and May 23, 2022, to discuss site status and path forward to address comments received during the public meeting.
- Initiated completion of supplemental site maintenance activities (e.g., mowing, removal of vines and shrubs, coordination with the City of Hattiesburg to ensure the right-of-way outside the fence is also mowed) to address comments from the community.
- Initiated development of a work plan, identifying qualified contractors to support additional work (e.g., supplemental mowing; fence maintenance; and removal of remaining tanks, pipes, and structures).

- Conducted the 2022 first semiannual monitoring event, including the scopes for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Poly Pale™ area, Northeast Delineation, and Hattiesburg Formation monitoring programs. The sampling event also included collection of confirmatory samples of soil, sediment, and surface water for laboratory analysis of total dioxathion.
- Continued 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.

PROBLEMS AND/OR DELAYS

- None identified.

TASKS PLANNED FOR JUNE 2022

- Finalize and submit 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 implementation of supplemental site maintenance activities.
- Initiate data management and evaluation of analytical results for the 2022 first semiannual monitoring event conducted in May 2022, including the scopes for the RUAO, Area #1, Area #2, Poly Pale™ area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Initiate data management and evaluation of analytical results for the confirmatory samples of soil, sediment, and surface water for laboratory analysis of total dioxathion.
- Continue submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Participate in conference calls with the USEPA and MDEQ to discuss the path forward for the project.

PERSONNEL AND/OR PROJECT CHANGES

- The USEPA proposed the site to the Superfund Program's National Priorities List on March 18, 2022.

COMMUNITY INVOLVEMENT

- A hybrid (virtual and in-person) public meeting was held in Hattiesburg on May 19, 2022. The meeting was hosted by the USEPA and the City of Hattiesburg to inform the community on the proposal by the USEPA to list the site in the Superfund Program's National Priorities List.
- The public comment period on the proposed listing was extended as requested by the City of Hattiesburg. The comment period now ends on June 16, 2022, to allow for further community engagement.

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 *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).
- Review the *2021 First Semiannual Consolidated Monitoring Report* submitted on March 11, 2022, summarizing the May 2021 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ Area, Hattiesburg Formation, and Northeast Delineation (first quarterly event in May 2021 and second quarterly event in September 2021) monitoring programs.
- 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

Mr. Maher Budeir
Page Four
June 20, 2022

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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)