



Hercules LLC
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Wilmington, DE 19808-1599
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November 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 (October 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 October 1 through October 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 Facility.

TASKS INITIATED, CONTINUED, OR COMPLETED DURING OCTOBER 2022

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) on October 4, 2022, to discuss the legal aspects of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (RI/FS) for the site, the Statement of Work (SOW) for the RI/FS, and next steps for the project.
- Participated in a conference call with the USEPA and Mississippi Department of Environmental Quality (MDEQ) on October 24, 2022, to provide updates on supplemental site maintenance activities, discuss technical aspects to incorporate current obligations and the work completed under the RCRA Orders, and the process for transitioning the site to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) program.
- Completed preparations for completion of the November 2022 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.

- Continued 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 received from the community during the May 19, 2022, hybrid (virtual and in-person) public meeting.
- Continued with the pre-demolition assessment, development of a work plan, and identification of qualified contractors to support removal of the remaining tanks, pipes, and structures at the site.
- Continued preparation of the next *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 summarize the fourth quarterly sampling completed in February 2022 for the Northeast Delineation monitoring program, as well as the May 2022 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ area, Northeast Delineation, and Hattiesburg Formation monitoring programs.

PROBLEMS AND/OR DELAYS

- None identified.

TASKS PLANNED FOR NOVEMBER 2022

- Finalize and submit the next *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 summarize the fourth quarterly sampling completed in February 2022 for the Northeast Delineation monitoring program, as well as the May 2022 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Finalize the legal discussions with the USEPA on the Administrative Settlement Agreement and Order on Consent for the RI/FS and the SOW for the RI/FS for the site.
- Conduct the November 2022 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Request reduction in Financial Assurance for decommissioning of the impoundment basin in connection with the RCRA 3008(h) Order.
- Continue implementation of supplemental site maintenance activities and preparations for removal of the remaining tanks, pipes, and structures at the site.
- Continue submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Participate in conference calls with the USEPA and MDEQ to continue technical discussions on the next steps 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

- The public comment period for the proposal by the USEPA to list the site on the Superfund Program's National Priorities List was extended as requested by the City of Hattiesburg. The comment period was extended to end 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 *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 *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) monitoring programs and the September 2021 second quarterly event for the Northeast Delineation monitoring program.
- Review the *Response to Comments Letter* submitted on September 9, 2022, to address the USEPA comments on the *Draft Baseline Risk Assessment Report*.
- Participate in conference calls and/or meetings to continue legal and technical discussions on the Administrative Settlement Agreement and Order on Consent for RI/FS for the site, the SOW for the RI/FS, and next steps for the project.

Mr. Maher Budeir
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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_October 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)