



Hercules LLC
Ashland Research Center
500 Hercules Road
Wilmington, DE 19808-1599

December 20, 2022

VIA ELECTRONIC MAIL

Ms. Diedre Lloyd
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Mr. Maher Budeir
Corrective Action Section
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Mail Code: 9T25
Atlanta, Georgia 30303-8960

RE: **Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report
(November 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**

**USEPA Region IV, CERCLA Administrative Settlement Agreement and Order on
Consent
Docket # 04-2023-2521**

Dear Ms. Lloyd and Mr. Budeir:

This *Monthly Progress Report* summarizes the activities accomplished from November 1 through November 30, 2022, in order to comply with the Resource Conservation and Recovery Act (RCRA) 3008(h) Order, the RCRA 3013(a) Order, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Administrative Settlement Agreement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study for the former Hercules facility in Hattiesburg, Mississippi.

TASKS INITIATED, CONTINUED, OR COMPLETED DURING NOVEMBER 2022

- Participated in conference calls with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on November 8 and November 29, 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 discuss the process for transitioning the site to the CERCLA program.
- Conducted 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 between November 7 and November 18, 2022.
- Executed the CERCLA ASAOC, effective November 17, 2022. The ASAOC provides for the performance of a remedial investigation and feasibility study by Hercules and the payment of certain response costs incurred by the United States at or in connection with the site.
- Finalized and submitted the *Consolidated Monitoring Report* on November 30, 2022. The document summarizes 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 also summarizes 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. Furthermore, the document includes a summary of confirmatory sampling activities conducted in May 2022 to evaluate Delnav® (in the form of total dioxathion) concentrations in soil, sediment, and surface water at select locations.
- 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 *Previous Investigation Summary Report* and the *Conceptual Site Model Report* in accordance with requirements in Section 3 (Initial Deliverables) of the Remedial Investigation/Feasibility Study Statement of Work for the site.

PROBLEMS AND/OR DELAYS

- None identified.

TASKS PLANNED FOR NEXT THREE MONTHS (DECEMBER 2022 – FEBRUARY 2023)

- Submit the Notice to Successors in Title pursuant to Section X (Property Requirements), paragraph 47.a, of the ASAOC.
- Coordinate the Kickoff Meeting as required in Section 6 (Meetings, Permits, and Reports) of the Remedial Investigation/Feasibility Study Statement of Work to discuss the specific needs and expectations for the *Previous Investigation Summary Report* and the *Conceptual Site Model Report*.

- Pay past response costs incurred by the United States at or in connection with the site pursuant to paragraph 57.a of the ASAOC.
- Provide the names, titles, addresses, telephone numbers, email addresses, and qualifications of project personnel pursuant to Section VII (Designation of Contractors and Project Coordinators), paragraph 30, of the ASAOC.
- Obtain the USEPA's approval of the form of financial assurance pursuant to Section XXIV (Financial Assurance), paragraph 104, of the ASAOC.
- Prepare and submit the *Previous Investigation Summary Report* and the *Conceptual Site Model Report* in accordance with requirements in Section 3 (Initial Deliverables) of the Remedial Investigation/Feasibility Study Statement of Work for the site.
- Coordinate the Remedial Investigation/Feasibility Study Scoping Meeting as required in Section 6 (Meetings, Permits, and Reports) of the Remedial Investigation/Feasibility Study Statement of Work to discuss the statement of work and a site visit and to document review needs.
- Designate the Community Involvement Coordinator pursuant to Section 2 (Community Involvement) of the Remedial Investigation/Feasibility Study Statement of Work for the site.
- Receive laboratory results and initiate management and evaluation of the data for the November 2022 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Prepare the *2022 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2022 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Request a reduction in Financial Assurance for the 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.

PERSONNEL AND/OR PROJECT CHANGES

- None identified.

COMMUNITY INVOLVEMENT

- 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.

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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 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, addressing the USEPA comments on the *Draft Baseline Risk Assessment Report*.
- Participate in conference calls and/or meetings to continue legal and technical discussions and next steps 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_November 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)