



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

January 20, 2023

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
(December 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 December 1 through December 31, 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 DECEMBER 2022

- Submitted the Notice to Successors in Title to the U.S. Environmental Protection Agency (USEPA) for approval on December 2, 2022, pursuant to Section X (Property Requirements), paragraph 47.a, of the ASAOC.
- Conducted a Kickoff Meeting with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) on December 8, 2022, 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*.
- Paid past response costs incurred by the United States at or in connection with the site pursuant to paragraph 57.a of the ASAOC. Payment posted on December 9, 2022.
- Provided the names, titles, addresses, telephone numbers, email addresses, and qualifications of project personnel on December 16, 2022, pursuant to Section VII (Designation of Contractors and Project Coordinators), paragraph 30, of the ASAOC.
- Submitted the *Monthly Progress Report* to the USEPA and MDEQ for November 2022 on December 20, 2022.
- Received notification from the USEPA on December 20, 2022, of a downed tree on the property boundary that caused damaged to the fence of the adjacent property. The Hercules team removed the tree and repaired the fence by December 23, 2022.
- Received preliminary results for samples collected during 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 *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

- Requested and received an extension to submit the form of Financial Assurance to the USEPA.
- Requested and received an extension to submit the *Previous Investigation Summary Report* and the *Conceptual Site Model Report* by February 10, 2023.
- The laboratory is experiencing challenges meeting standard turnaround times, and complete data release for the samples collected in November 2022 is delayed.

TASKS PLANNED FOR NEXT THREE MONTHS (JANUARY – MARCH 2023)

- Obtain the USEPA's approval of the form of Financial Assurance pursuant to Section XXIV (Financial Assurance), paragraph 104, of the ASAOC.

- Finalize 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 final 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 and submit 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 submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.

PERSONNEL AND/OR PROJECT CHANGES

- None identified.

COMMUNITY INVOLVEMENT

- The USEPA extended an invitation for a working meeting in relation to community involvement prior to the next USEPA public meeting. Final schedule to be determined at a later date.

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.

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- Review the *Remedial Design Work Plan – Sludge Pits* (dated September 28, 2021), describing the selected remedy and associated data that will be used to inform 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*.
- Review and approve the Notice to Successors in Title submitted on December 2, 2022, pursuant to Section X (Property Requirements), paragraph 47.a, of the ASAOC.
- Participate in conference calls and/or meetings to continue discussions about 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_December 2022

cc: Cassandra Johnson – MDEQ, Jackson, MS (electronic)
Thomas Wallace – MDEQ, Jackson, MS (electronic)
Robin Lampkin – Hercules, Dublin, OH (electronic)
Jason Hughes – Arcadis, Birmingham, AL (electronic)