

VIA ELECTRONIC MAIL

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Date: May 20, 2024

Our Ref: 30205536.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (April 2024)

USEPA Region IV, RCRA 3013(a) Administrative Order
Docket # RCRA-04-2011-4251

USEPA Region IV, RCRA 3008(h) Administrative Order on Consent
Docket # RCRA-04-2014-4201(b)

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 between April 1 and April 30, 2024, per the 2011 Resource Conservation and Recovery Act (RCRA) 3013(a) Administrative Order, the 2014 RCRA 3008(h) Administrative Order on Consent, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Administrative Settlement Agreement and Order on Consent (ASAOC) for the Remedial Investigation (RI)/Feasibility Study (FS) for the former Hercules LLC (Hercules) site in Hattiesburg, Mississippi, referred to herein as “the site.”

Tasks Initiated, Continued, or Completed during April 2024

The following summary is intended to memorialize significant activities (e.g., field work, conference calls, technical deliverables, correspondence) performed throughout the reporting period, and is not intended to capture all email correspondence between the U.S. Environmental Protection Agency (USEPA) and Hercules over that same period.

- Received a letter from the USEPA dated April 2, 2024, with subject: *EPA Response to Hercules request for discussion of OU approach for Hercules Inc. Superfund Site in Hattiesburg, Mississippi.*
 - That letter denied Hercules' request for a meeting with USEPA management to discuss the proposed Operable Unit (OU) approach for managing the site and the mechanisms of how the OU approach would potentially be implemented in relation to the RI/FS (e.g., deliverables, timing, eventual Record of Decision) and the ASAOC. That letter also indicated that USEPA's technical team would be available to continue to discuss the implementation of an OU approach for managing the site.
 - Hercules provided a response in a letter to the USEPA dated April 10, 2024, with subject: *Hercules Response to EPA April 2, 2024 Letter Regarding Hattiesburg Site.* As reiterated therein, Hercules is open and has proactively suggested in the past to implement an appropriate OU approach following completion of the RI/FS, which will provide data that would be foundational to identifying potential OUs and any potential future remediation activities required at the site.
 - Further, as noted in Hercules response letter, the Remedial Investigation/Feasibility Study Work Plan (*RI/FS Work Plan*) submitted on December 4, 2023, provides the factual and technical information necessary to build an OU approach to the site. In addition, the letter suggests that the USEPA could approve the investigations proposed in the *RI/FS Work Plan* that are necessary to support a more complete evaluation of current conditions, while also advancing the proposed pilot tests described in prior submittals allowing them to be implemented. That approach would create forward-momentum and results that could be achieved within the next few years. The *RI/FS Work Plan* remains under review by the USEPA.
- Received a letter from the USEPA dated April 4, 2024, with subject: *Rescission or RCRA Orders and request for completion of outstanding items for the Hercules Inc. Superfund Site in Hattiesburg, Mississippi.*
 - That letter indicated that “[a]s stated in the Administrative Settlement Agreement and Order on Consent (AOC) for RI/FS, the RCRA administrative Orders will be superseded in full upon approval of an RIWP that incorporates any ongoing monitoring and reporting activities required by the RCRA Administrative Orders. Hercules may incorporate ongoing monitoring and reporting activities into the revised RIWP for the Site’s initial operable units, and approval will serve to supersede the RCRA Administrative Orders”. Those comments are inaccurate, and Hercules will follow up with the appropriate USEPA personnel.
 - That letter also requested the following items from Hercules: 1) responses to the USEPA comments provided to Hercules in letters dated October 12, 2023, regarding the *Conceptual Site Model Report* and the *Previous Investigation Summary Report* (submitted by Hercules on February 10, 2023); 2) responses to comments provided by the USEPA (letter listed May 2023, June 2023, August 2023, September 2023, and December 2023 comments) related to the *Vapor Intrusion Investigation Summary Report* submitted by Hercules on August 7, 2023, be addressed in a revised report; 3) preparation of a memorandum documenting the team response to the sanitary sewer blockage reported at the 134 West 8th Street property; 4) submittal of the depth-to-groundwater measurements collected to determine the timing for completion of remaining vapor intrusion investigation activities for the neighborhood located southeast from the site. The USEPA indicate a due date of April 19, 2024 (i.e., within 14 days of the date of the USEPA letter), for these four requests.
 - The USEPA also indicated that Hercules should submit a request to the USEPA for approval of Ms. Christina Piechoski serving as a Co-Coordinator for the project (co-coordinator with Mr. Timothy Hassett).
 - Hercules provided responses to these topics in a letter to the USEPA dated April 11, 2024, with subject: *Hercules Response to EPA April 4, 2024 Letter Regarding Hattiesburg Site.* That letter indicates that

some of the statements by the USEPA are inaccurate and demonstrates that the requests by the USEPA are premature, inappropriate, and/or contradict previous guidance and agreements. The letter states that it is not conducive to proper site management for the USEPA to contradict those previous guidance and agreements, and request information within 14 days of a communication; particularly for information that the USEPA already has and/or information that does not facilitate completion of work at the site. The letter also indicates that Hercules remains committed to full cooperation with the USEPA according to the terms of the ASAOC.

- Submitted an email to the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on April 22, 2024, presenting Hercules' proposal for areas that could be treated as OUs based on: the historical data at the site; the current understanding of the need for potential future remedial actions (including previously submitted pilot test and remedial design work plans); and the additional investigation activities proposed in the December 4, 2023 *RI/FS Work Plan* to refine the conceptual site model (CSM). As noted therein, Hercules recommends implementing the investigations proposed in the *RI/FS Work Plan* and incorporating that data into the CSM before identifying and/or establishing the final list of areas that may need to be managed as OUs.
- Submitted the *Monthly Progress Report* for March 2024 to the Agencies on April 22, 2024.
- Received an email from the USEPA on April 22, 2024, indicating that USEPA personnel were having difficulties accessing the SharePoint webpage used to upload project submittals. The following activities were performed in response to that notification:
 - USEPA personnel Diedre Lloyd, Ben Bentkowski, Kevin Koporec, Brett Thomas were re-added to the SharePoint on April 23, 2024, and credentials for access were refreshed. Mr. Bentkowski and Mr. Koporec subsequently indicated they were able to access the SharePoint. Ms. Lloyd sent an email on April 25, 2024, indicating that she continues to have difficulties accessing the SharePoint webpage.
 - Arcadis Project Manager Corey Averill provided a response via email on April 26, 2024, with suggestions to troubleshoot the access issue. A follow up email was sent by Mr. Averill on April 29, 2024, with additional information provided by the Arcadis Information Technology (IT) department to facilitate access to the SharePoint webpage. The email also inquired if the USEPA had an alternate proposed file sharing website or was able to use compact discs (CDs) or thumb drives as alternatives for distribution of future submittals. Ms. Lloyd replied via email on April 30, 2024, that the USEPA does not allow for use of CDs/thumb drives and that she would check with USEPA's IT department regarding protocols for file exchange.
 - In the interim, electronic copies of the *Emergency Response and Notification Plan*, the *Data Management Plan*, the *Health and Safety Plan*, the *Sampling and Analysis Plan*, the *Field Sampling Plan*, and the *Reuse Assessment* were provided to the USEPA in three separate emails on April 26, 2024. Additionally, an electronic copy of the *Quality Assurance Project Plan* was provided to the USEPA via two separate emails (due to file size) on April 30, 2024.
- Continued to collect depth-to-groundwater measurements using a transducer installed in piezometer TP-18. The available data are included as **Attachment A** to this *Monthly Progress Report*, which indicates that the criterion agreed upon by the USEPA and Hercules (i.e., a depth-to-groundwater of at least seven feet below grade) to complete collection of the remaining soil gas samples proposed in the *Revised Addendum to the Vapor Intrusion Investigation Work Plan* (Revised Addendum to the VII Work Plan) has not yet been achieved. Sample collection will proceed per the approved work plan when this criterion is achieved.

- Continued preparation of the *2023 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2023 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs, as agreed in the ASAOC.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (May – July 2024)

- Continue to monitor depth-to-groundwater levels in TP-18 to determine when the criterion for collection of the remaining soil gas samples has been achieved.
- Preparation of a *Revised Vapor Intrusion Investigation Summary Report* addressing previous comments from the USEPA and documenting the results of the current phase of the vapor intrusion investigation. Per the USEPA-approved *Revised Addendum to Vapor Intrusion Investigation Work Plan* dated January 4, 2024, it was previously agreed with the USEPA that the report will be due six weeks following the final field activity. As noted previously, the collection of certain soil gas samples proposed in the *Revised Addendum to the VII Work Plan* remains to be completed.
- Finalize and submit the *2023 Second Semiannual Consolidated Monitoring Report* summarizing the November 2023 sampling event for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Implement the 2024 first semiannual monitoring event in accordance with requirements in the RUAO and RCRA Orders.
- Receive, review, and respond to USEPA and MDEQ comments on the December 4, 2023 *RI/FS Work Plan*, and the seven RI Deliverables submitted in March 2024, as discussed during the February 28, 2024 meeting in Jackson, Mississippi.
- Continue discussions with the USEPA regarding the implementation of an OU concept for management of the site, including the mechanisms of how the OU approach would potentially be implemented in relation to the RI/FS (e.g., deliverables, timing, eventual Record of Decision) and the ASAOC.

Personnel and/or Project Changes

- None this period.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- As discussed during the February 28, 2024 meeting, Hercules is awaiting review Agency comments on the December 4, 2023 *RI/FS Work Plan*, as well as the seven RI Deliverables submitted in March 2024.
- Hercules requests participation by the Agencies in working meetings to continue discussions about finalization of the *RI/FS Work Plan* and the OU concept for management of the site.

Ms. Diedre Lloyd and Mr. Maher Budeir
May 20, 2024

The Hercules team appreciates your support with this project. If there are any questions concerning this submittal, please contact the Project Coordinator, Mr. Timothy Hassett, at 302-995-3456 or Mr. Corey Averill with Arcadis at 315-671-9224.

Sincerely,

Arcadis U.S., Inc.



Corey Averill
Certified Project Manager

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CC. Cassandra Johnson – MDEQ, Jackson, MS (electronic)
Thomas Wallace – MDEQ, Jackson, MS (electronic)
Chrissy Piechoski – Hercules, Wilmington, DE (electronic)
Timothy Hassett – Hercules, Wilmington, DE (electronic)
Gloria Tatum – Tatum & Associates, Jackson, MS (electronic)

Attachment A

**Summary of Depth-to-Groundwater Measurements
from TP-18**

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (April 2024)
Hercules Superfund Site
Hattiesburg, Mississippi

Date	Averaged data over 24-hour period from TP-18			Comments
	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation ⁽¹⁾ (ft msl)	
4/30/2024	7.14	4.16	165.43	(2)
4/29/2024	7.07	4.23	165.36	(2)
4/28/2024	6.96	4.34	165.25	(2)
4/27/2024	6.88	4.42	165.17	(2)
4/26/2024	6.79	4.51	165.08	(2)
4/25/2024	6.69	4.61	164.98	(2)
4/24/2024	6.62	4.68	164.91	(2)
4/23/2024	6.62	4.68	164.91	(2)
4/22/2024	7.22	4.08	165.51	(2)
4/21/2024	7.19	4.11	165.49	(2)
4/20/2024	7.11	4.19	165.4	(2)
4/19/2024	7.23	4.07	165.52	(2)
4/18/2024	7.36	3.94	165.65	(2)
4/17/2024	7.49	3.81	165.78	(2)
4/16/2024	7.71	3.59	166	(2)
4/15/2024	7.84	3.46	166.13	(2)
4/14/2024	8.04	3.26	166.33	(2)
4/13/2024	8.25	3.05	166.54	(2)
4/12/2024	8.5	2.8	166.79	(2)
4/11/2024	8.81	2.49	167.1	(2)
4/10/2024	7.93	3.37	166.23	(2)
4/9/2024	7.32	3.98	165.62	(2)
4/8/2024	7.27	4.03	165.57	(2)
4/7/2024	7.51	3.79	165.8	(2)
4/6/2024	7.4	3.9	165.69	(2)
4/5/2024	7.67	3.63	165.96	(2)
4/4/2024	7.86	3.44	166.15	(2)
4/3/2024	8.08	3.22	166.37	(2)
4/2/2024	8.25	3.05	166.55	(2)
4/1/2024	8.41	2.89	166.7	(2)
3/31/2024	8.59	2.71	166.88	(2)
3/30/2024	8.81	2.49	167.11	(2)
3/29/2024	9.05	2.25	167.34	(2)
3/28/2024	9.18	2.12	167.48	(2)
3/27/2024	9.45	1.85	167.75	(2)
3/26/2024	9.18	2.12	167.47	(2)
3/25/2024	8.51	2.79	166.80	(2)
3/24/2024	8.30	3.00	166.60	(2)
3/22/2024	8.69	2.61	166.98	(2)

Footnotes on Page 3.

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (April 2024)
Hercules Superfund Site
Hattiesburg, Mississippi

Date	Averaged data over 24-hour period from TP-18			Comments
	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation ⁽¹⁾ (ft msl)	
3/21/2024	8.86	2.44	167.15	(2)
3/20/2024	9.17	2.13	167.46	(3)
3/19/2024	9.36	1.94	167.66	(3)
3/18/2024	9.71	1.59	168.00	(3)
3/17/2024	8.94	2.36	167.23	(3)
3/16/2024	8.91	2.40	167.20	(3)
3/15/2024	8.10	3.20	166.39	(3)
3/14/2024	8.28	3.02	166.57	(3)
3/13/2024	8.51	2.80	166.80	(3)
3/12/2024	8.73	2.57	167.03	(3)
3/11/2024	9.00	2.30	167.29	(3)
3/10/2024	9.58	1.72	167.88	(3)
3/9/2024	10.08	1.22	168.37	(3)
3/8/2024	7.67	3.64	165.96	(3)
3/7/2024	7.85	3.45	166.15	(3)
3/6/2024	6.97	4.33	165.27	(3)
3/5/2024	6.97	4.33	165.27	(3)
3/4/2024	7.02	4.28	165.31	(3)
3/3/2024	7.11	4.19	165.40	(3)
3/2/2024	6.72	4.58	165.01	(3)
3/1/2024	5.33	5.97	163.63	(3)
2/29/2024	5.35	5.95	163.64	(3)
2/28/2024	5.45	5.85	163.74	(3)
2/27/2024	5.49	5.81	163.78	(3)
2/26/2024	5.51	5.79	163.80	(3)
2/25/2024	5.54	5.76	163.83	(3)
2/24/2024	5.61	5.70	163.90	(3)
2/23/2024	5.72	5.58	164.01	(3)
2/22/2024	5.72	5.58	164.01	(3)
2/21/2024	5.73	5.57	164.02	(3)
2/20/2024	5.79	5.51	164.09	(3)
2/19/2024	5.85	5.45	164.14	(3)
2/18/2024	5.89	5.41	164.18	(3)
2/17/2024	5.98	5.32	164.27	(3)
2/16/2024	5.99	5.31	164.29	(3)
2/15/2024	5.99	5.31	164.29	(3)
2/14/2024	5.97	5.33	164.27	(3)
2/13/2024	5.91	5.39	164.20	(3)
2/9/2024	5.89	5.41	164.19	(3)

Footnotes on Page 3.

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (April 2024)
Hercules Superfund Site
Hattiesburg, Mississippi

Date	Averaged data over 24-hour period from TP-18			Comments
	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation ⁽¹⁾ (ft msl)	

Notes:

- (1) - Top of casing elevation for TP-18 is 169.593 feet relative to mean sea level using the North American Vertical Datum of 1988.
- (2) - Data extracted from manual transducer download.
- (3) - Data exported from telemetry cloud.

Abbreviations:

- ft - feet.
- ft btoc - feet below top of casing.
- ft msl - feet mean sea level.