

VIA ELECTRONIC MAIL

Ms. Diedre Lloyd
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
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

Arcadis U.S., Inc.
One Lincoln Center
110 West Fayette Street
Suite 300
Syracuse
New York 13202
Phone: 315 446 9120
Fax: 315 449 0017
www.arcadis.com

Date: April 22, 2024

Our Ref: 30205536.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (March 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 March 1 and March 31, 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 March 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.

- Submitted an email to the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on March 6, 2024, thanking them for taking the time to meet in Jackson, Mississippi on February 28, 2024. Hercules' objective for that meeting was to discuss the *Remedial Investigation/Feasibility Study Work Plan (RI/FS Work Plan)* submitted on December 4, 2023, and facilitate approval for implementation of the *RI/FS Work Plan* per the schedule previously agreed to with the USEPA management (i.e., summer 2024). In addition, the following items were noted during that meeting:
 - The USEPA stated that they had not completed their review of the *RI/FS Work Plan* and would provide comments to Hercules by March 31, 2024.
 - The USEPA also discussed potentially pivoting from the strategy they previously provided to Hercules for the *RI/FS*, namely moving to an Operable Unit (OU) approach instead of the site-wide approach previously requested. Previous discussions (most notably during a November 3, 2023 conference call) had included moving into an OU approach after the site-wide *RI/FS* is completed and the conceptual site model (CSM) is refined.
 - The USEPA offered to have future discussions regarding the potential of transitioning into an OU concept at this point in time (versus transitioning at a later time).
- As discussed during the February 28, 2024 meeting, Hercules submitted to the Agencies the following three RI Deliverables on March 6, 2024: the *Emergency Response and Notification Plan*, the *Data Management Plan*, and the *Health and Safety Plan*. Subsequently, the following four RI Deliverables were submitted to the Agencies on March 29, 2024: the *Sampling and Analysis Plan*, the *Field Sampling Plan*, the *Quality Assurance Project Plan*, and the *Reuse Assessment*. As described in the *RI/FS Work Plan*, these seven RI deliverables were originally intended to be submitted after Hercules received comments from the USEPA on the *RI/FS Work Plan*; however, since the USEPA was delayed in providing comments, Hercules offered to submit these documents with the goal of helping the *RI/FS* move forward and facilitate subsequent implementation of the *RI/FS Work Plan* per the schedule previously agreed to with the USEPA management (i.e., summer 2024).
- Received an email from the USEPA on March 14, 2024, with a copy of the final *Community Involvement Plan* (dated March 13, 2024) for the site. The document was developed by the USEPA; the Hercules team and its Community Involvement Coordinator were not afforded the opportunity to review and provide comments on that document.
- Submitted the *Monthly Progress Report* for February 2024 to the Agencies on March 19, 2024.
- Received an email from the USEPA on March 22, 2024, containing the following information:
 - Comments from Kevin Koporec (USEPA Scientific Support Services) related to a *Response to Comments* letter submitted by Hercules on September 9, 2022. The September 2022 letter was prepared by Hercules to provide responses to comments provided by the USEPA on July 5, 2022, and to summarize discussions between the Agencies and the Hercules team during a conference call on August 17, 2022, regarding the *Draft Baseline Risk Assessment* submitted by Hercules on January 29, 2021.
 - A PowerPoint presentation with information regarding the potential use of an OU concept for management of the site and development of the *RI/FS Work Plan*. Previous discussions between Hercules and the USEPA were to develop a site-wide *RI/FS Work Plan*, and then move into OUs after implementation of the *RI/FS* scope and refinement of the CSM.
 - Request for information regarding depth-to-groundwater measurements that are being collected to determine appropriate timing for completion of remaining vapor intrusion investigation activities. The

available information is included as **Attachment A** to this *Monthly Progress Report*, which indicates that the criterion agreed upon by the USEPA and Hercules to attempt collection of the remaining soil vapor samples (i.e., a depth-to-groundwater of at least seven feet below grade) has not yet been achieved. Sample collection will proceed per the approved work plan when this criterion is achieved.

- USEPA expressed appreciation for the rapid response to the sanitary sewer backup reported at the 134 West 8th Street property. The investigation performed by an Arcadis subcontractor determined that roots/vegetation and sanitary wipes were the cause of the sewer blockage, and that the blockage was unrelated to the recently completed vapor intrusion investigation activities. The blockage was cleared by the subcontractor as a courtesy to the property owner, and the matter is considered to be resolved.
- Submitted an email to the USEPA on March 22, 2024, requesting a call to discuss in more detail the potential of pivoting the RI/FS approach from site-wide to OUs for management of the site, and the mechanisms of how the OU approach would potentially be implemented related to the RI/FS (e.g., deliverables, timing, eventual Record of Decision) and the ASAOC. A follow-up email was sent on March 29, 2024, requesting USEPA availability for a call to discuss the OU concept.
- Continued to gather depth-to-groundwater measurements using a transducer installed in piezometer TP-18. The data are being used to further support decisions regarding the timing to complete the soil gas sample collection activities described in the USEPA-approved *Revised Addendum to Vapor Intrusion Investigation Work Plan* dated January 4, 2024. As previously indicated, the agreed-upon criterion for collection of the remaining soil vapor samples (i.e., a depth-to-groundwater of at least seven feet below grade) has not been achieved at this time (**Attachment A**).
- 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 (April – June 2024)

- Continue to monitor depth-to-groundwater levels in TP-18 to determine a date for collection of the remaining soil gas samples for the vapor intrusion investigation.
- 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.
- Finalize and submit the *2023 Second Semiannual Consolidated Monitoring Report* summarizing the November 2023 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Coordination and implementation of the 2024 first semiannual monitoring event in accordance with requirements in the RUAO and RCRA Orders.
- Update the Bond for Financial Assurance, as requested by the USEPA.

Ms. Diedre Lloyd and Mr. Maher Budeir
April 22, 2024

- Receive, review, and respond to USEPA and MDEQ comments (if any) 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 to discuss with the USEPA the potential of transitioning into an OU concept for management of the site earlier than previously discussed, and the mechanisms of how the OU approach would potentially be implemented related 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

- The USEPA developed a *Community Involvement Plan* for the site, dated March 13, 2024 (the Hercules team and its Community Involvement Coordinator were not afforded the opportunity to review and provide comments on that document).

USEPA/MDEQ Support Needed

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

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

Email: Corey.Averill@arcadis.com

Direct Line: 315-671-9224

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 (March 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)	
3/31/2024	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)
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)

Footnotes on Page 2.

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (March 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)	
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)

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.