

VIA ELECTRONIC MAIL

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U.S. Environmental Protection Agency, Region 4
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Mr. Maher Budeir
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Date: June 20, 2024

Our Ref: 30205536.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (May 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 May 1 and May 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 2022 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 May 2024

The following summary is intended to document 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.

- Conducted the 2024 first semiannual monitoring event during the weeks of May 6 and May 13, 2024. The field work included the scopes for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs, as agreed in the ASAOC.
- Submitted the *Monthly Progress Report* for April 2024 to the Agencies on May 20, 2024.
- Submitted a letter to the USEPA dated May 23, 2024, with subject: *Response to USEPA March 22, 2024 Comments on September 9, 2022 Response to Comments Letter*. This letter provided responses to the USEPA's comments received via email on March 22, 2024, regarding the *Response to Comments Letter* submitted by Hercules on September 9, 2022. The September 2022 *Response to Comment Letter* was provided in response to the USEPA's initial comments on the human health risk assessment portion of the *Draft Baseline Risk Assessment* submitted by Hercules to the USEPA and Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on January 29, 2021. The USEPA's initial comments on the *Draft Baseline Risk Assessment* were provided to Hercules on July 5, 2022.
- Ms. Gloria Tatum (Hercules' designated Community Involvement Coordinator) submitted a letter to the USEPA dated May 28, 2024, with subject: *Community Involvement Activities*. This letter recommended improvements to the community involvement process that would enhance future communications to members of the community.
- Received a letter from the USEPA dated May 30, 2024, with subject: *Response to Tatum & Associates' May 28, 2024, letter regarding community involvement at the Hercules Inc. Superfund Site in Hattiesburg, Mississippi*. This letter, which was submitted by Marjorie Thomas (USEPA's Community Involvement Coordinator), provided a response to the recommendations included in Ms. Tatum's May 28, 2024 letter, and indicated that Ms. Thomas is willing to participate in regular meetings with Ms. Tatum in the future for collaboration and communication purposes.
- 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 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 (June – August 2024)

- 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.

- Prepare and submit an *Interim Vapor Intrusion Investigation Summary Report* as requested by the USEPA. The document will summarize the portion of the vapor intrusion investigation activities conducted in January 2024; the collection of certain soil gas samples proposed in the *Revised Addendum to the VII Work Plan* dated January 4, 2024, was not feasible due to the presence of elevated depth-to-groundwater conditions at that time. In accordance with the USEPA- approved work plan, Hercules submitted an email to the Agencies on February 6, 2024, providing the laboratory analytical data reports for the soil gas, ambient air, and sewer gas samples that were collected in January 2024, along with summary tables with the data compared to the USEPA Vapor Intrusion Screening Levels.
- Hercules will provide a draft fact sheet to the USEPA to support the Agencies sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area.
- 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 so the scope in the USEPA-approved *Revised Addendum to the VII Work Plan* can be completed.
- 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 the VII Work Plan*, it was previously agreed with the USEPA that the report will be submitted six weeks following completion of the final field activity. As noted previously, the collection of certain soil gas samples proposed therein remains to be completed.
- Hercules is awaiting comments from the Agencies on the *Remedial Investigation/Feasibility Study Work Plan* (RI/FS Work Plan) submitted by Hercules on December 4, 2023, and the following seven RI Deliverables submitted in March 2024:
 - *Emergency Response and Notification Plan.*
 - *Data Management Plan.*
 - *Health and Safety Plan.*
 - *Sampling and Analysis Plan.*
 - *Field Sampling Plan.*
 - *Quality Assurance Project Plan.*
 - *Reuse Assessment.*
- Initiate data management and review for the samples collected during the 2024 first semiannual monitoring event conducted during the weeks of May 6 and May 13, 2024.
- Continue discussions with the USEPA regarding the implementation of the proposed Operable Unit (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 requirements in the ASAOC.

Personnel and/or Project Changes

- None this period.

Community Involvement

- None this period.

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

USEPA/MDEQ Support Needed

- As discussed during the February 28, 2024 meeting with the Agencies, Hercules is awaiting comments from the Agencies on the December 4, 2023 *RI/FS Work Plan*, as well as the seven RI Deliverables submitted in March 2024. The USEPA originally indicated comments would be provided by the end of 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.

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 (May 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)	
5/31/2024	6.55	4.75	164.84	(2)
5/30/2024	6.62	4.68	164.91	(2)
5/29/2024	6.62	4.68	164.91	(2)
5/28/2024	6.69	4.61	164.99	(2)
5/27/2024	6.82	4.48	165.11	(2)
5/26/2024	6.94	4.36	165.24	(2)
5/25/2024	7.07	4.23	165.36	(2)
5/24/2024	7.22	4.08	165.52	(2)
5/23/2024	7.36	3.94	165.65	(2)
5/22/2024	7.52	3.78	165.82	(2)
5/21/2024	7.72	3.58	166.02	(2)
5/20/2024	8.09	3.21	166.38	(2)
5/19/2024	7.9	3.4	166.19	(2)
5/18/2024	7.64	3.66	165.93	(2)
5/17/2024	8	3.3	166.29	(2)
5/16/2024	8.34	2.96	166.64	(2)
5/15/2024	8.12	3.18	166.41	(2)
5/14/2024	7.97	3.33	166.27	(2)
5/13/2024	6.4	4.9	164.7	(2)
5/12/2024	5.85	5.45	164.14	(2)
5/11/2024	5.9	5.4	164.19	(2)
5/10/2024	6.03	5.27	164.33	(2)
5/9/2024	6.02	5.28	164.31	(2)
5/8/2024	6.1	5.2	164.39	(2)
5/7/2024	6.17	5.13	164.47	(2)
5/6/2024	6.55	4.75	164.85	(2)
5/5/2024	6.55	4.75	164.85	(2)
5/4/2024	6.49	4.81	164.78	(2)
5/3/2024	6.42	4.88	164.72	(2)
5/2/2024	6.36	4.94	164.66	(2)
5/1/2024	6.3	5	164.59	(2)
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)

Footnotes on Page 3.

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (May 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)	
4/21/2024	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)
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)

Footnotes on Page 3.

Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
Monthly Progress Report (May 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)	
3/11/2024	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)

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.