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: August 19, 2024
Our Ref: 30205536.0400
Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (July 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 July 1 and July 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 July 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.

- Received a letter from the USEPA on July 3, 2024, providing review comments on the *Remedial Investigation/Feasibility Study Work Plan* (RI/FS Work Plan) submitted by Hercules on December 4, 2023. The USEPA letter included the following requests:
  - Modify the overall RI/FS strategy from site-wide to an Operable Unit (OU) approach.
  - Provide response to comments and a revised-redline version of the RI/FS Work Plan within 30 days from the date of the letter.
  - Submittal of revised versions of the RI Deliverables submitted by Hercules in March 2024 (i.e., *Sampling and Analysis Plan*, *Data Management Plan*, *Field Sampling Plan*, *Emergency Response and Notification Plan*, *Health and Safety Plan*, *Quality Assurance Project Plan*, and *Reuse Assessment*) within 30 days from the date of the letter.
- Received an email from the USEPA on July 14, 2024, providing additional comments related to the *Draft Baseline Risk Assessment* submitted by Hercules on January 29, 2021. The USEPA's comments were provided in response to a letter submitted by Hercules to USEPA on May 23, 2024 with subject *Response to USEPA March 22, 2024 Comments on September 9, 2022 Response to Comments Letter*. As indicated in a July 15, 2024 email to USEPA, Hercules will incorporate USEPA's July 14, 2024 comments into the updated *Baseline Risk Assessment* to be prepared following the completion of the RI activities.
- Submitted the *Monthly Progress Report* for June 2024 to the Agencies on July 18, 2024.
- Submitted a letter to the USEPA on July 23, 2024, with subject *Initial Response to July 3, 2024 USEPA Comments on RI/FS Work Plan and Extension for Submittal of Revised RI/FS Work Plan and RI Deliverables*. Hercules' initial responses documented ongoing themes from the USEPA that have resulted in uncertain implementation schedules, inefficiencies, and repetitive work. In addition, the letter suggested to focus an upcoming meeting on (1) when USEPA and/or MDEQ will complete their review of the RI/FS Work Plan and seven RI Deliverables, (2) define the overall strategic approach, scope, and data gaps to be addressed in the RI/FS Work Plan, and (3) determine the critical-path activities necessary to implement the RI/FS activities.
- Participated in a conference call on July 24, 2024, with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) to discuss the July 3, 2024 USEPA comments and an extension to the due date for submittal of response to comments, Revised RI/FS Work Plan, and revised RI Deliverables. An email with a summary of the discussed topics and associated action items was submitted to USEPA by Hercules on July 26, 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 USEPA-approved *Revised Addendum to the Vapor Intrusion Investigation Work Plan* (dated January 4, 2024) has not yet been achieved. Collection of the remaining samples will proceed per the approved work plan when this criterion is achieved.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (August – October 2024)

- Participate in weekly meetings with the Agencies as needed to discuss the comments from the USEPA on the RI/FS Work Plan, and continue developing the OU concept for management of the site (e.g., reach consensus on the OUs, deliverables, and schedule for RI implementation and eventual Record of Decision).
- 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 Vapor Intrusion Investigation 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 Vapor Intrusion Investigation 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.
- Preparation of the *2024 First Semiannual Consolidated Monitoring Report* summarizing the May 2024 sampling event for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.

Personnel and/or Project Changes

- None this period.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Hercules is awaiting comments on the following seven RI Deliverables submitted in March 2024, which support the contents and proposed scope in the RI/FS Work Plan:
  - *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*.
- Hercules is also awaiting comments from the Agencies on the *Interim Vapor Intrusion Investigation Summary Report* and the draft fact sheet provided to support sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area. Both documents were submitted by Hercules on June 3, 2024.

Ms. Diedre Lloyd and Mr. Maher Budeir
August 19, 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

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 (July 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)	
7/31/2024	4.50	6.80	162.79	(2)
7/30/2024	4.50	6.80	162.79	(2)
7/29/2024	4.47	6.83	162.76	(2)
7/28/2024	4.45	6.85	162.74	(2)
7/27/2024	4.46	6.84	162.75	(2)
7/26/2024	4.45	6.85	162.74	(2)
7/25/2024	4.43	6.87	162.72	(2)
7/24/2024	4.43	6.87	162.72	(2)
7/23/2024	4.43	6.87	162.72	(2)
7/22/2024	4.45	6.85	162.74	(2)
7/21/2024	4.46	6.84	162.75	(2)
7/20/2024	4.48	6.82	162.77	(2)
7/19/2024	4.49	6.81	162.78	(2)
7/18/2024	4.52	6.78	162.81	(2)
7/17/2024	4.54	6.76	162.83	(2)
7/16/2024	4.57	6.73	162.86	(2)
7/15/2024	4.60	6.70	162.89	(2)
7/14/2024	4.62	6.68	162.91	(2)
7/13/2024	4.63	6.67	162.92	(2)
7/12/2024	4.67	6.63	162.96	(2)
7/11/2024	4.71	6.59	163.00	(2)
7/10/2024	4.75	6.55	163.04	(2)
7/9/2024	4.78	6.52	163.07	(2)
7/8/2024	4.82	6.48	163.11	(2)
7/7/2024	4.86	6.44	163.15	(2)
7/6/2024	4.90	6.40	163.19	(2)
7/5/2024	4.94	6.36	163.23	(2)
7/4/2024	4.98	6.32	163.27	(2)
7/3/2024	5.02	6.28	163.31	(2)
7/2/2024	5.08	6.22	163.37	(2)
7/1/2024	5.13	6.17	163.42	(2)
6/30/2024	5.17	6.13	163.46	(2)
6/29/2024	5.22	6.08	163.51	(2)
6/28/2024	5.28	6.02	163.57	(2)
6/27/2024	5.34	5.96	163.63	(2)
6/26/2024	5.40	5.90	163.69	(2)
6/25/2024	5.43	5.87	163.72	(2)
6/24/2024	5.47	5.83	163.76	(2)

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Attachment A
Summary of Depth-to-Groundwater Measurements from TP-18
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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)	
6/23/2024	5.54	5.76	163.83	(2)
6/22/2024	5.59	5.71	163.88	(2)
6/22/2024	5.62	5.68	163.91	(2)
6/21/2024	5.65	5.65	163.94	(2)
6/20/2024	5.70	5.60	163.99	(2)
6/19/2024	5.77	5.53	164.06	(2)
6/18/2024	5.82	5.48	164.11	(2)
6/17/2024	5.88	5.42	164.17	(2)
6/16/2024	5.93	5.37	164.22	(2)
6/15/2024	6.02	5.28	164.31	(2)
6/14/2024	6.11	5.19	164.40	(2)
6/13/2024	6.20	5.10	164.49	(2)
6/12/2024	6.30	5.00	164.59	(2)
6/11/2024	6.44	4.86	164.73	(2)
6/10/2024	6.61	4.69	164.90	(2)
6/9/2024	6.76	4.54	165.05	(2)
6/8/2024	6.90	4.40	165.19	(2)
6/7/2024	7.02	4.28	165.31	(2)
6/6/2024	6.78	4.52	165.07	(2)
6/5/2024	6.36	4.94	164.65	(2)
6/4/2024	6.38	4.92	164.67	(2)
6/3/2024	6.43	4.87	164.72	(2)
6/2/2024	6.48	4.82	164.77	(2)
6/1/2024	6.51	4.79	164.80	(2)
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	164.98	(2)
5/27/2024	6.82	4.48	165.11	(2)
5/26/2024	6.94	4.36	165.23	(2)
5/25/2024	7.07	4.23	165.36	(2)
5/24/2024	7.22	4.08	165.51	(2)
5/23/2024	7.36	3.94	165.65	(2)
5/22/2024	7.52	3.78	165.81	(2)
5/21/2024	7.72	3.58	166.01	(2)
5/20/2024	8.09	3.21	166.38	(2)
5/19/2024	7.90	3.40	166.19	(2)
5/18/2024	7.64	3.66	165.93	(2)

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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)	
5/17/2024	8.00	3.30	166.29	(2)
5/16/2024	8.34	2.96	166.63	(2)
5/15/2024	8.12	3.18	166.41	(2)
5/14/2024	7.97	3.33	166.26	(2)
5/13/2024	6.40	4.90	164.69	(2)
5/12/2024	5.85	5.45	164.14	(2)
5/11/2024	5.90	5.40	164.19	(2)
5/10/2024	6.03	5.27	164.32	(2)
5/9/2024	6.02	5.28	164.31	(2)
5/8/2024	6.10	5.20	164.39	(2)
5/7/2024	6.17	5.13	164.46	(2)
5/6/2024	6.55	4.75	164.84	(2)
5/5/2024	6.55	4.75	164.84	(2)
5/4/2024	6.49	4.81	164.78	(2)
5/3/2024	6.42	4.88	164.71	(2)
5/2/2024	6.36	4.94	164.65	(2)
5/1/2024	6.30	5.00	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)
4/21/2024	7.19	4.11	165.48	(2)
4/20/2024	7.11	4.19	165.40	(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	166.00	(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	8.50	2.80	166.79	(2)
4/11/2024	8.81	2.49	167.10	(2)
4/10/2024	7.93	3.37	166.22	(2)

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	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation[(1)] (ft msl)	
4/9/2024	7.32	3.98	165.61	(2)
4/8/2024	7.27	4.03	165.56	(2)
4/7/2024	7.51	3.79	165.80	(2)
4/6/2024	7.40	3.90	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	166.54	(2)
4/1/2024	8.41	2.89	166.70	(2)
3/31/2024	8.59	2.71	166.88	(2)
3/30/2024	8.81	2.49	167.10	(2)
3/29/2024	9.05	2.25	167.34	(2)
3/28/2024	9.18	2.12	167.47	(2)
3/27/2024	9.45	1.85	167.74	(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	166.59	(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	167.65	(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	2.39	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	2.79	166.80	(3)
3/12/2024	8.73	2.57	167.02	(3)
3/11/2024	9.00	2.30	167.29	(3)
3/10/2024	9.58	1.72	167.87	(3)
3/9/2024	10.08	1.22	168.37	(3)
3/8/2024	7.67	3.63	165.96	(3)
3/7/2024	7.85	3.45	166.14	(3)
3/6/2024	6.97	4.33	165.26	(3)
3/5/2024	6.97	4.33	165.26	(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)

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	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation[(1)] (ft msl)	
3/1/2024	5.33	5.97	163.62	(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	5.69	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	164.08	(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	164.28	(3)
2/15/2024	5.99	5.31	164.28	(3)
2/14/2024	5.97	5.33	164.26	(3)
2/13/2024	5.91	5.39	164.20	(3)
2/9/2024	5.89	5.41	164.18	(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.