

#### **VIA ELECTRONIC MAIL**

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Mr. Maher Budeir
Corrective Action Section
Resource Conservation and Restoration Division
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Date: September 19, 2024 Our Ref: 30205536.0400

Subject: Hercules Hattiesburg Facility - Hattiesburg, MS - Monthly Progress Report (August 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 August 1 and August 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 August 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.

- Submitted a letter to the USEPA dated August 2, 2024, with subject: Request for Extension to Respond to Comments on the Revised RI/FS Work Plan and RI Deliverables. That letter indicated the following:
  - The submittal served as a formal written extension request to the USEPA's request to provide response to comments of the USEPA's July 3, 2024 comments on the *Remedial Investigation/Feasibility Study Work Plan* (RI/FS Work Plan) submitted by Hercules on December 4, 2023, a revised RI/FS Work Plan, and revised versions of seven 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 of the USEPA's comment letter.
  - The new due date is dependent on: a) USEPA completing its review and providing a comprehensive set of comments on the RI/FS Work Plan and RI Deliverables; b) USEPA providing the information required under Paragraph 6.1(b) of the Statement of Work (SOW), which is Appendix B to the ASAOC; and c) allowing Hercules adequate time to address those comments and incorporate the new information in revised documents.
  - ➤ In accordance with Paragraph 8.1 of the SOW, Hercules will address comments within 120 days of completion of a and b above.
- Participated in a conference call on August 7, 2024, with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) to continue discussion of the USEPA's July 3, 2024 comments on the RI/FS Work Plan, the USEPA's request to change the overall RI/FS strategy from site-wide to an Operable Unit (OU) approach, and the path forward for the project. Subsequently, the following correspondence was exchanged by the USEPA and Hercules:
  - An email with a summary of the discussed topics and agreed-upon action items was submitted to USEPA by Hercules on August 9, 2024.
  - Received an email from the USEPA on August 14, 2024, which included the PowerPoint slides used by the USEPA during the August 7, 2024 conference call.
- Participated in a follow up conference call on August 14, 2024, with the Agencies to further discuss the proposed OUs for the site, the status of the USEPA's review of the RI Deliverables, which documents will require revisions based on USEPA's request to change the overall RI/FS strategy to an OU approach, and the conceptual schedule for OU-specific scoping meetings and revision of the RI/FS Work Plan and RI Deliverables. Subsequently, Hercules submitted an email with a summary of the discussed topics and agreed-upon action items was submitted to USEPA by Hercules on August 15, 2024. That email included files documenting the proposed OUs discussed during the call, the conceptual schedule with the critical path tasks for next steps, and confirmation on the approach to revise the RI Deliverables.
- Submitted the Monthly Progress Report for July 2024 to the Agencies on August 19, 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. Those data indicate 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) had been achieved.

- Hercules notified the USEPA of achieving the criterion via email on August 22, 2024. That email indicated that the team was planning on conducting a visit by August 30, 2024, to test conditions within the soil gas points and start preparations to complete collection of the remaining soil gas samples. The USEPA and Hercules exchanged additional correspondence on August 23, 26, and 27, 2024, related to the schedule for the soil gas sampling activities (first week of September 2024) and confirming that the USEPA notified the property owners.
- Received an email from the USEPA on August 22, 2024, requesting to provide access to the SharePoint
  webpage used to upload project submittals to Mr. James Ferreira of the USEPA, and to confirm that Mr. Kevin
  Koporec and Mr. Brett Thomas of the USEPA also had access. Access was issued/reissued to all requested
  personnel that same day.
- Participated in a follow up conference call on August 28, 2024, with the Agencies to further discuss the OUs proposed during the August 14, 2024 call and provided via email on August 15, 2024, set a preliminary schedule for the OU-specific scoping calls, and provide an update on the pending completion of the vapor intrusion investigation (i.e., collection of remaining soil gas samples). An email with a summary of the discussed topics and associated action items was submitted to USEPA by Hercules later that same day.
- Continue 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.

#### **Challenges and/or Delays**

None this period.

### Tasks Planned for Next Three Months (September - November 2024)

- Participate in OU-specific scoping meetings with the Agencies to discuss existing data, data gaps, data quality objectives and proposed investigations, as well as revisions to the RI/FS Work Plan and RI Deliverables.
- Completion of the remaining scope in the USEPA-approved *Revised Addendum to the Vapor Intrusion Investigation Work Plan*. Soil gas samples were collected during the week of September 2, 2024, from eight properties that could not be sampled in January 2024 due to elevated depth-to-groundwater conditions.
- Discontinue monitoring depth-to-groundwater levels in TP-18. The criterion for collection of the remaining soil
  gas samples has been achieved and this task fulfilled its objective.
- 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, the revised report will
  be submitted six weeks following completion of the final field activity (i.e., by October 18, 2024).
- Completion and submittal of the 2024 First Semiannual Consolidated Monitoring Report summarizing the May 2024 sampling event for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.

#### Personnel and/or Project Changes

 Mr. James Ferreira has been designated as the USEPA Hydrogeologist/Vapor Intrusion Subject Matter Expert for the site.

### **Community Involvement**

The USEPA notified the property owners involved in the vapor intrusion investigation activities within the
neighborhood located southeast of the site. The collection of the remaining soil gas samples in the USEPAapproved Revised Addendum to the Vapor Intrusion Investigation Work Plan were conducted during the week
of September 2, 2024.

### **USEPA/MDEQ Support Needed**

- Hercules is awaiting review and/or comments on Table 8-1 through Table 8-4 of the RI/FS Work Plan, 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.
- 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.
- As noted above, a *Sampling and Analysis Plan* was submitted to USEPA in March 2024 per Paragraph 4.5(a) of the SOW. Subsequent communications indicate the following:
  - ➤ The USEPA requested the Sampling and Analysis Plan be revised in their July 3, 2024 comment letter; however, based on a follow up discussion with the USEPA on August 14, 2024, a Sampling and Analysis Plan is no longer required.
  - > The requirement for a Sampling and Analysis Plan in the SOW will be met through submittal of revised Quality Assurance Project Plan, Field Sampling Plan, and Data Management Plan (after review and receipt of comments from USEPA).
  - The USEPA agreed to send Hercules a letter to memorialize the agreement, and Hercules is awaiting the official letter documenting the above.

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.

Ms. Diedre Lloyd and Mr. Maher Budeir September 19, 2024

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



	Averaged data over 24-hour period from TP-18			
Date	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation <sup>(1)</sup> (ft msl)	Comments
8/31/2024	4.06	7.24	162.35	(2)
8/30/2024	4.08	7.22	162.37	(2)
8/29/2024	4.11	7.19	162.40	(2)
8/28/2024	4.14	7.16	162.43	(2)
8/27/2024	4.17	7.13	162.46	(2)
8/26/2024	4.19	7.11	162.48	(2)
8/25/2024	4.19	7.11	162.48	(2)
8/24/2024	4.21	7.09	162.50	(2)
8/23/2024	4.22	7.08	162.51	(2)
8/22/2024	4.22	7.08	162.51	(2)
8/21/2024	4.20	7.10	162.49	(2)
8/20/2024	4.19	7.11	162.48	(2)
8/19/2024	4.14	7.16	162.43	(2)
8/18/2024	4.12	7.18	162.41	(2)
8/17/2024	4.14	7.16	162.43	(2)
8/16/2024	4.16	7.14	162.45	(2)
8/15/2024	4.19	7.11	162.48	(2)
8/14/2024	4.22	7.08	162.51	(2)
8/13/2024	4.25	7.05	162.54	(2)
8/12/2024	4.28	7.02	162.57	(2)
8/11/2024	4.30	7.00	162.59	(2)
8/10/2024	4.33	6.97	162.62	(2)
8/9/2024	4.36	6.94	162.65	(2)
8/8/2024	4.39	6.91	162.68	(2)
8/7/2024	4.42	6.88	162.71	(2)
8/6/2024	4.43	6.87	162.72	(2)
8/5/2024	4.45	6.85	162.74	(2)
8/4/2024	4.47	6.83	162.76	(2)
8/3/2024	4.48	6.82	162.77	(2)
8/2/2024	4.49	6.81	162.78	(2)
8/1/2024	4.49	6.81	162.78	(2)
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)



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



Date .	Averaged data over 24-hour period from TP-18			
	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation <sup>(1)</sup>	Comments
0/47/0004		5.40	(ft msl)	(0)
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)
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)



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



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



Date .				_
	Level Troll (ft of water above transducer)	Depth-to-Groundwater (ft btoc)	Groundwater Elevation <sup>(1)</sup> (ft msl)	Comments
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.