

VIA ELECTRONIC MAIL

Ms. Shelby Johnston
RCS Chief
Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Mr. Maher Budeir
Corrective Action Section
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U.S. Environmental Protection Agency, Region 4
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Date: October 21, 2024

Our Ref: 30205536.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (September 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. Johnston and Mr. Budeir:

This *Monthly Progress Report* summarizes the activities accomplished between September 1 and September 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 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 September 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.

- Completed the remaining scope in the USEPA-approved *Revised Addendum to the Vapor Intrusion Investigation Work Plan* during the week of September 2, 2024. Soil gas samples were collected from properties that could not be sampled in January 2024 due to elevated depth-to-groundwater conditions during the initial field event.
- Received an email from the USEPA on September 3, 2024, indicating concurrence with the Operable Units (OUs) proposed during the August 14, 2024 call and map provided via email on August 15, 2024, and with the preliminary schedule to commence the OU-specific scoping calls.
- Submitted the *Monthly Progress Report* for August 2024 to the Agencies on September 19, 2024.
- Provided the analytical data associated with the vapor intrusion investigation samples collected during the week of September 2, 2024. The communications included the following:
 - Submitted an email to the USEPA on September 26, 2024, containing the laboratory report and preliminary summary of the detected constituents with comparison to the corresponding Vapor Intrusion Screening Levels for the soil gas samples. In accordance with the USEPA-approved work plan, the data were provided to the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) approximately 24 hours after receipt from the laboratory.
 - Due to delays by the laboratory to provide the soil gas analytical data, combined with the need to validate and complete evaluations of the data, the September 26, 2024 email included Hercules' proposal to adjusted the due date for submittal of the *Revised Vapor Intrusion Investigation Summary Report* from October 18, 2024, to November 15, 2024.
 - The September 26, 2024 email also included Hercules' proposal that the results of the January/September 2024 soil gas sampling data be reviewed as part of the OU-specific technical meeting for OU-2 (i.e., former Area #1) to determine the need for/scope of any additional vapor intrusion investigation activities, and that any such activities be incorporated into the future investigation activities performed as part of the RI.
 - Submitted a second email on September 27, 2024, containing the laboratory report for the ambient air samples collected as part of the vapor intrusion investigation. In accordance with the USEPA-approved work plan, the data were provided to the Agencies approximately 24 hours after receipt from the laboratory.
 - The USEPA acknowledged receipt of the data and concurred via email on September 27, 2024, with the new due date for submittal of the *Revised Vapor Intrusion Investigation Summary Report*.
- Completed the collection of depth-to-groundwater measurements using a transducer installed in piezometer TP-18. The data are included as **Attachment A** to this *Monthly Progress Report*. The collection of the remaining soil gas samples was completed during the week of September 2, 2024; therefore, monitoring depth-to-groundwater levels in TP-18 has been discontinued.
- 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

- The laboratory experienced delays analyzing and releasing the data packages for the vapor intrusion investigation samples submitted in September 2024. As a result, the due date for submittal of the *Revised Vapor Intrusion Investigation Report* was adjusted from October 18, 2024, to November 15, 2024.

Tasks Planned for Next Three Months (October – December 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 December 4, 2023 *Remedial Investigation/Feasibility Study Work Plan* (RI/FS Work Plan) and RI Deliverables.
- 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.
- 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. The revised report will be submitted by November 15, 2024.

Personnel and/or Project Changes

- Ms. Diedre Lloyd took a different position with the USEPA Region 10 Superfund group and is no longer the Remediation Project Manager (RPM) for the site. Ms. Shelby Johnston will be the primary USEPA contact for the project while a new RPM is assigned.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Participate in OU-specific scoping meetings 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.
- 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.*

Ms. Shelby Johnston and Mr. Maher Budeir
October 21, 2024

- Hercules is also awaiting comments 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.
- A *Sampling and Analysis Plan* was submitted to USEPA in March 2024 per Paragraph 4.5(a) of the Statement of Work (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.

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 (September 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)	
9/30/2024	4.00	7.30	162.29	(2)
9/29/2024	4.00	7.30	162.30	(2)
9/28/2024	4.02	7.28	162.31	(2)
9/27/2024	4.04	7.26	162.33	(2)
9/26/2024	4.06	7.24	162.35	(2)
9/25/2024	4.06	7.24	162.35	(2)
9/24/2024	4.07	7.23	162.36	(2)
9/23/2024	4.09	7.21	162.38	(2)
9/22/2024	4.11	7.19	162.40	(2)
9/21/2024	4.12	7.18	162.41	(2)
9/20/2024	4.14	7.16	162.43	(2)
9/19/2024	4.14	7.16	162.44	(2)
9/18/2024	4.15	7.15	162.44	(2)
9/17/2024	4.14	7.16	162.44	(2)
9/16/2024	4.14	7.16	162.43	(2)
9/15/2024	4.14	7.16	162.43	(2)
9/14/2024	4.13	7.17	162.42	(2)
9/13/2024	4.12	7.18	162.41	(2)
9/12/2024	4.09	7.21	162.39	(2)
9/11/2024	4.07	7.23	162.36	(2)
9/10/2024	4.08	7.22	162.37	(2)
9/9/2024	4.09	7.21	162.38	(2)
9/8/2024	4.11	7.19	162.40	(2)
9/7/2024	4.13	7.17	162.42	(2)
9/6/2024	4.15	7.15	162.44	(2)
9/5/2024	4.16	7.14	162.45	(2)
9/4/2024	4.18	7.12	162.47	(2)
9/3/2024	4.18	7.12	162.47	(2)
9/2/2024	4.10	7.20	162.39	(2)
9/1/2024	4.07	7.23	162.36	(2)
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)

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

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Monthly Progress Report (September 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)	
7/14/2024	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)
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)

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Monthly Progress Report (September 2024)
Hercules Superfund Site
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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)	
6/6/2024	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)
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)

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Monthly Progress Report (September 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)	
4/28/2024	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)
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)

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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)	
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)
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)

Footnotes on Page 7.

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