

VIA ELECTRONIC MAIL

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

- Participated in two conference calls with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) to discuss existing data, data gaps, data quality objectives, and proposed investigations in support of revising the *Remedial Investigation/Feasibility Study Work Plan (RI/FS Work Plan)* submitted by Hercules on December 4, 2023. The USEPA provided review comments on that document in a letter dated July 3, 2024, which included a request to modify their original overall RI/FS strategy from a site-wide approach to an Operable Unit-(OU) based approach. Consequently, calls were scheduled for weekly or biweekly occurrence as OU-specific scoping meetings, and the schedule was adjusted based on the availability of USEPA personnel. The following calls took place during the current period:
 - The OU-specific scoping meeting for OU-9 (Former Stump Pile Area) was held on October 1, 2024. An email was provided that same day with the materials presented during the call, including the PowerPoint slide deck, historical aerial photography, summary tables with historical data screened against updated criteria (i.e., 2024 USEPA regional screening levels [RSLs] with hazard index [HI] of 0.1, and 2018 USEPA ecological screening levels), summary table with proposed investigation activities, and figures depicting historical data with exceedances of the updated screening criteria.
 - The OU-specific scoping meeting for OU-3 (Former Area #2) was held on October 4, 2024. An email was provided that same day with the materials presented during the call, including the PowerPoint slide deck, summary tables with historical data screened against updated criteria (i.e., 2024 USEPA RSLs with HI of 0.1), summary table with proposed investigation activities, and figures depicting historical data with exceedances of the updated screening criteria.
- Submitted the *Monthly Progress Report* for September 2024 to the Agencies on October 21, 2024.
- Initiated preparations for implementation of the 2024 second semiannual monitoring event to be completed in November 2024, which will include the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs in accordance with the ASAOC, as well as the requirements in the RUAO and RCRA Orders for the site.
- Continue preparation of the *2023 & 2024 Vapor Intrusion Investigation Summary Report* documenting the results of the vapor intrusion investigation activities conducted between May 2023 and September 2024.
- Continue preparation 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.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (November 2024 – January 2025)

- Continue 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. The calls were scheduled for weekly or biweekly occurrence, and the schedule has been adjusted to allow the USEPA project team members sufficient time to review the data summary package materials, and/or as required to accommodate project team schedules based on ongoing discussions between the Agencies, Hercules, and Arcadis. The following table summarizes the status of the OU-specific scoping meetings:

OU	Scoping Meeting Date	Comments from USEPA/MDEQ	Notes
OU-9 (Former Stump Pile Area)	10/1/2024	TBD	Preliminary comments were provided by the Agencies during conference calls on November 5 and November 12, 2024.
OU-3 (Former Area #2)	10/4/2024	TBD	Preliminary comments were provided by the Agencies during a conference call on November 12, 2024.
OU-1 (Surface Water and Sediment; Greens Creek, Drainage B, and Drainage C to Bouie River)	TBD	TBD	
OU-2 (Former Area #1)	TBD	TBD	
OU-4 (Sludge Pits Area)	TBD	TBD	
OU-5 (Closed Industrial Landfill)	TBD	TBD	
OU-6 (Poly Pale™/Delnav® Area)	TBD	TBD	
OU-7 (Central Area)	TBD	TBD	
OU-8 (Former Area #3)	TBD	TBD	
OU-10 (Alluvial Aquifer; Site-Wide Groundwater)	TBD	TBD	
OU-11 (Hattiesburg Formation; Site-Wide Groundwater)	TBD	TBD	

- Coordination and implementation of the 2024 second semiannual monitoring event in accordance with the agreement in the ASAOC, and requirements in the RUAO and RCRA Orders for the site.
- 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.
- Completion and submittal of the *2023 & 2024 Vapor Intrusion Investigation Summary Report* documenting the results of the vapor intrusion investigation. Due to updates to the USEPA RSLs and Vapor Intrusion Screening Level (VISL) Calculator published on November 13, 2024, which have the potential to impact the screening levels and VISL calculations presented in the report, USEPA approved a modification to the submittal date from November 15, 2024, to November 22, 2024, to allow time to review the updates and incorporate appropriate revisions to the report (if any).
- Review and discuss with the Agencies the comments provided by the USEPA via email on November 5, 2024, regarding the *Quality Assurance Project Plan* submitted by Hercules on March 29, 2024.

Personnel and/or Project Changes

- Ms. Diedre Lloyd took a different position with the USEPA Region 10 and is no longer the Remediation Project Manager (RPM) for the site. Ms. Shelby Johnston notified Hercules via email on November 5, 2024, that Mr. Do Hyong Kim will be added as an RPM for the site and the Ms. Johnston would continue to be the primary USEPA contact for the project.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Continue 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 the following RI Deliverables submitted in March 2024, as summarized in the table below:

RI Deliverable	Submittal Date	Comments from USEPA/MDEQ	Notes
<i>Quality Assurance Project Plan</i>	3/29/2024	11/5/2024	Critical for the RI phase. Approval required prior to RI implementation.
<i>Emergency Response and Notification Plan</i>	3/6/2024	TBD	Agreed this is not critical for the RI phase. The Agencies will review and provide comments, as applicable.
<i>Data Management Plan</i>	3/6/2024	TBD	Critical for the RI phase. Approval required prior to RI implementation
<i>Health and Safety Plan</i>	3/6/2024	TBD	Critical for the RI phase. The Agencies will review and provide comments, if needed, prior to RI implementation.
<i>Sampling and Analysis Plan</i>	3/29/2024	---	No longer required, as discussed with the USEPA (see below).
<i>Field Sampling Plan</i>	3/29/2024	TBD	Critical for the RI phase. Approval required prior to RI implementation
<i>Reuse Assessment</i>	3/29/2024	TBD	Agreed this is not critical for the RI phase. The Agencies will review and provide comments, as applicable.

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- 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 on August 14, 2024, the USEPA stated that 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.
- 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

The Hercules team appreciates your support with this project. If there are any questions concerning this submittal, please contact the Project Coordinator, Ms. Chrissy Piechoski at 302-647-9798, or Mr. Corey Averill with Arcadis, at 315-671-9224.

Sincerely,

Arcadis U.S., Inc.



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