

VIA ELECTRONIC MAIL

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Date: December 19, 2024

Our Ref: 30251700.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (November 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 November 1 and November 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 November 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 second semiannual monitoring event during the weeks of November 4 and November 11, 2024. The field work included the scopes for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs in accordance with the agreement in the ASAO, and requirements in the RUAO and RCRA Orders for the site.
- Received a letter from the USEPA on November 5, 2024, providing comments on the *Quality Assurance Project Plan* (QAPP) submitted by Hercules on March 29, 2024.
- Participated in conference calls with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on November 5 and November 12, 2024, to discuss the history, historical data, data gaps, data quality objectives, and the proposed investigations (as described in the December 4, 2023 *Remedial Investigation/Feasibility Study Work Plan* [RI/FS Work Plan]) for two Operable Units (OUs): OU-9 (Former Stump Pile Area) and OU-3 (Former Area #2). The materials presented and a summary of the discussions were circulated via email after each call.
- Submitted an email to the USEPA on November 14, 2024, requesting an extension until November 22, 2024, for submittal of the *2023 & 2024 Vapor Intrusion Investigation Summary Report*. The extension was needed to allow time to review and incorporate updates to the USEPA Regional Screening Levels and Vapor Intrusion Screening Level (VISL) Calculator that were published on November 13, 2024, which had the potential to impact the screening levels and VISL calculations presented in the report. The USEPA approved the extension request on the same day. The document (which summarized the results of the vapor intrusion investigation activities conducted between May 2023 and September 2024) was subsequently submitted to the Agencies on November 22, 2024.
- Submitted the *2024 First Semiannual Consolidated Monitoring Report* to the Agencies on November 15, 2024. The document summarized the May 2024 sampling event for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Submitted the *Monthly Progress Report* for October 2024 to the Agencies on November 19, 2024.
- Submitted a letter to the USEPA dated November 22, 2024, with subject: *Project Coordinator Update*. This letter notified the Agencies of the change in the Hercules Project Manager/Project Coordinator from Mr. Tim Hassett to Ms. Chrissy Piechoski.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (December 2024 – February 2025)

- Continue OU-specific scoping meetings with the Agencies to discuss the history, existing data, data gaps, data quality objectives and proposed investigations, as well as revisions to the *RI/FS Work Plan* and seven RI Deliverables submitted in March 2024. The original biweekly schedule for the calls 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:

Operable Unit	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 conference calls on November 12 and December 3, 2024.
OU-8 (Former Area #3)	TBD	TBD	
OU-5 (Closed Industrial Landfill)	TBD	TBD	
OU-4 (Sludge Pits Area)	TBD	TBD	
OU-1 (Surface Water and Sediment; Greens Creek, Drainage B, and Drainage C to Bouie River)	TBD	TBD	
OU-6 (Poly Pale™/Delnav® Area)	TBD	TBD	
OU-11 (Hattiesburg Formation; Site-Wide Groundwater)	TBD	TBD	
OU-2 (Former Area #1)	TBD	TBD	
OU-7 (Central Area)	TBD	TBD	
OU-10 (Alluvial Aquifer; Site-Wide Groundwater)	TBD	TBD	

- Review and discuss with the Agencies the comments on the *Quality Assurance Project Plan* provided by the USEPA on November 5, 2024, regarding the. A conference call was conducted on December 17, 2024.

Personnel and/or Project Changes

- Two new members were introduced as part of the USEPA project: Mr. Do Hyong Kim joined the team on November 5, 2024, and Ms. Porcha McCurdy joined on December 3, 2024. Ms. Shelby Johnston will continue to be the primary USEPA contact for the project.
- Ms. Chrissy Piechoski will be the new Hercules Project Manager/Project Coordinator for the site starting December 1, 2024.

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 RI Deliverables, 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	Essential for the RI phase. Approval required prior to RI implementation.
<i>Emergency Response and Notification Plan</i>	3/6/2024	TBD	Teams agreed that finalizing this document is not essential prior to initiating the RI phase. The Agencies will review and provide comments, as applicable.
<i>Data Management Plan (DMP)</i>	3/6/2024	TBD	Essential for the RI phase. Approval required prior to RI implementation
<i>Health and Safety Plan</i>	3/6/2024	TBD	Essential for the RI phase. The Agencies will review and provide comments, if needed, prior to RI implementation.
<i>Field Sampling Plan (FSP)</i>	3/29/2024	TBD	Essential for the RI phase. Approval required prior to RI implementation
<i>Reuse Assessment</i>	3/29/2024	TBD	Teams agreed that finalizing this document is not essential prior to initiating the RI phase. The Agencies will review and provide comments, as applicable.

- A *Sampling and Analysis Plan (SAP)* was submitted to the USEPA on March 29, 2024, per Paragraph 4.5(a) of the Statement of Work (SOW). The USEPA requested revisions to the *SAP* in their July 3, 2024 comment letter; however, based on a follow-up discussion on August 14, 2024, the USEPA stated that a *SAP* is no longer required, as the *RI/FS Work Plan*, *FSP*, *DMP*, and *QAPP* will satisfy the substantive requirements of that document. The USEPA agreed to send Hercules a letter memorializing the agreement, and Hercules is awaiting the official letter.
- Hercules is awaiting comments on the draft fact sheet submitted to the Agencies on June 3, 2024. The document was provided to support sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area.

Ms. Shelby Johnston and Mr. Maher Budeir
December 19, 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.



Corey Averill
Certified Project Manager

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- CC. Cassandra Johnson – MDEQ, Jackson, MS (electronic)
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