

VIA ELECTRONIC MAIL

Ms. Diedre Lloyd
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Arcadis U.S., Inc.
1728 3rd Avenue North
Suite 300
Birmingham
Alabama 35203
Phone: 205 930 5700
Fax: 205 930 5707
www.arcadis.com

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

Date: March 20, 2023

Our Ref: 30158342.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (February 2023)

USEPA Region IV, RCRA 3008(h) Order
Docket # RCRA-04-2014-4201(b)

USEPA Region IV, RCRA 3013(a) Order
Docket # RCRA-04-2011-4251

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 from February 1 through February 28, 2023, in order to comply with the Resource Conservation and Recovery Act (RCRA) 3008(h) Order, the RCRA 3013(a) Order, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Administrative Settlement Agreement and Order on Consent (ASAOC) for the Remedial Investigation/Feasibility Study (RI/FS) for the former Hercules facility in Hattiesburg, Mississippi.

Tasks Initiated, Continued, or Completed during February 2023

- Submitted to the U.S. Environmental Protection Agency (USEPA) a request on February 9, 2023, to reduce the Financial Assurance for the decommissioning of the impoundment basin in connection with the RCRA 3008(h) Order.
- Conducted health and safety awareness training for site personnel on February 9, 2023.

- Finalized and submitted the *Previous Investigation Summary Report* and the *Conceptual Site Model Report* on February 10, 2023, in accordance with requirements in Section 3 (Initial Deliverables) of the RI/FS Statement of Work (SOW) for the site.
- Finalized and submitted an *Addendum to the Previous Investigation Summary Report* on February 17, 2023, in response to a request by the USEPA to provide information regarding a pre-demolition building materials survey completed to evaluate options for demolition of remaining aboveground structures located in the east-central portion of the site.
- Submitted the *Monthly Progress Report* to the USEPA and Mississippi Department of Environmental Quality (MDEQ) for January 2023 on February 20, 2023.
- Received a request by the USEPA on February 21, 2023, to conduct a site walk-down of the former Hercules facility. The site walk-down was requested for the afternoon of March 16, 2023, prior to the public meeting scheduled for the evening of March 16, 2023.
- Submitted to the USEPA a letter on February 24, 2023, proposing to schedule the RI/FS scoping meeting within 60 to 90 days from the date of the letter. The request meets the requirements in Section 6 (Meetings, Permits, and Reports) of the RI/FS SOW to schedule the meeting within 14 days of submittal of the *Previous Investigation Summary Report* and the *Conceptual Site Model Report* and allows the USEPA sufficient time to review the reports and develop a conceptual understanding for the next steps needed to be undertaken in the Superfund process.
- Initiated preparations to participate in the public meeting scheduled for March 16, 2023, to discuss the addition of the site to the National Priorities List and next steps of the Superfund process.
- Continued preparation of the *2022 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2022 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Continued with site maintenance activities (e.g., mowing, removal of vines and shrubs, coordination with the City of Hattiesburg to ensure the right-of-way outside the fence is also mowed).

Problems and/or Delays

- None.

Tasks Planned for Next Three Months (March–May 2023)

- Obtain USEPA approval of the form of Financial Assurance submitted on January 6, 2023, pursuant to Section XXIV (Financial Assurance), paragraph 104, of the ASAOC.
- Conduct the site walk-down with the USEPA and MDEQ on the afternoon of March 16, 2023, and participate in the public meeting on the evening of March 16, 2023.
- Prepare for the RI/FS scoping meeting, pursuant to Section 6 (Meetings, Permits, and Reports) of the RI/FS SOW. The USEPA proposed to coordinate a virtual meeting for March 21, 2023.
- Finalize and submit the *2022 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2022 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Prepare for and conduct the 2023 first semiannual monitoring event in May 2023 in accordance with the agreement in the ASAOC, including the scopes for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.

- Continue submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.

Personnel and/or Project Changes

- None.

Community Involvement

- The USEPA announced on January 25, 2023, that a public meeting would be hosted on March 16, 2023, at the C.E. Roy Community Center to discuss the addition of the former Hercules facility in Hattiesburg, Mississippi, to the National Priorities List and the next steps of the Superfund process.

USEPA/MDEQ Support Needed

- Review the *Final Dense Non-Aqueous Phase Liquid Supplemental Investigation Report* submitted on July 29, 2020, incorporating new data and addressing USEPA comments on the draft version.
- Review the *Supplemental Groundwater Investigation Report* submitted on September 25, 2020, summarizing the assessment data for groundwater quality delineation along property boundaries.
- Review the *Impoundment Basin and ET-10 Decommissioning Completion Report* submitted on April 28, 2021, summarizing the decommissioning activities completed in accordance with the *Revised Interim Measures Work Plan* (dated November 7, 2014) and the *Final Interim Measures Design Report* (dated March 17, 2015).
- Review the *Draft 1,4-Dioxane Treatment – Propane Biosparge Pilot Test Work Plan* submitted on May 27, 2021, describing the proposed methodology to assess an in-situ approach as a viable technology for treatment of 1,4-dioxane at the site.
- Review the *Remedial Design Work Plan – Sludge Pits* (dated September 28, 2021), describing the selected remedy and associated data that will be used to inform remedial action for the sludge pit area.
- Review the *Poly Pale™ Area Pilot Test Completion Report* submitted on October 29, 2021, summarizing the results of the air sparge/soil vapor extraction pilot study and proposing the next steps for the Poly Pale™ Area.
- Review the *Response to Comments Letter* submitted on January 31, 2022, addressing the review comments provided by the USEPA on November 4, 2021, regarding the *Long-Term Groundwater Monitoring Optimization Plan* (dated April 28, 2021).
- Review the *2021 First Semiannual Consolidated Monitoring Report* submitted on March 11, 2022, summarizing the May 2021 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ Area, Hattiesburg Formation, and Northeast Delineation (first quarterly event) monitoring programs and the September 2021 second quarterly event for the Northeast Delineation monitoring program.
- Review the *Response to Comments Letter* submitted on September 9, 2022, addressing the USEPA comments on the *Draft Baseline Risk Assessment Report*.
- Review the *Consolidated Monitoring Report* submitted on November 30, 2022, summarizing the November 2021 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ Area, and Northeast Delineation (third quarterly sampling) monitoring programs. The document also summarizes the fourth quarterly sampling completed in February 2022 for the Northeast Delineation monitoring program as well as the May 2022 sampling events for the RUAO, Area #1, Area #2, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs. Furthermore, the document includes a summary of confirmatory sampling

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activities conducted in May 2022 to evaluate Delnav® (in the form of total dioxathion) concentrations in soil, sediment, and surface water at select locations.

- Review the *Previous Investigation Summary Report* and the *Conceptual Site Model Report* submitted on February 10, 2023.
- Participate in conference calls and/or meetings to continue discussions about next steps for the project.

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. Jason Hughes with Arcadis at 205-930-5965.

Sincerely,
Arcadis U.S., Inc.



Jason Hughes
Certified Project Manager

Email: jason.hughes@arcadis.com
Direct Line: 205-930-5965

- CC. Cassandra Johnson – MDEQ, Jackson, MS (electronic)
Thomas Wallace – MDEQ, Jackson, MS (electronic)
Timothy Hassett – Hercules, Wilmington, DE (electronic)
Robin Lampkin – Hercules, Dublin, OH (electronic)