

**VIA ELECTRONIC MAIL**

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Date: April 19, 2023

Our Ref: 30158342.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (March 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 March 1 through March 31, 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 (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 March 2023**

- Participated in a conference call with the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on March 3, 2023, to provide updates and discuss preparations for the upcoming public meeting in Hattiesburg, Mississippi.
- Received an *Approval of Cost Estimate and Financial Assurance Reduction* letter from the USEPA on March 8, 2023, approving the request to decrease the financial assurance coverage required by the 2014

RCRA 3008(h) Order. The reduction is possible because Hercules has substantially completed the work required under the RCRA 3008(h) Order, and the ongoing investigatory actions and future work at the site are being transitioned to the CERCLA program.

- Prepared for the RI/FS scoping meeting, pursuant to Section 6 (Meetings, Permits, and Reports) of the RI/FS Statement of Work (SOW). On March 13, 2023, the USEPA proposed to coordinate a virtual meeting for March 21, 2023.
- Conducted a site visit with the USEPA and MDEQ on the afternoon of March 16, 2023.
- Participated in the public meeting on the evening of March 16, 2023, at the C.E. Roy Community Center to discuss the addition of the site to the National Priorities List and the next steps of the CERCLA process.
- Submitted the *Monthly Progress Report* for February 2023 to the USEPA and MDEQ on March 20, 2023.
- Received a scoping summary from the USEPA on March 21, 2023, in preparation for the RI/FS scoping meeting. The document included an informal request to prepare and submit an *Expedited Work Plan* by April 4, 2023, to delineate the purported migration of constituents of interest in groundwater into the surrounding community from the southeastern portion of the site.
- Participated in the virtual scoping meeting with the USEPA and MDEQ on March 21, 2023. The request for the *Expedited Work Plan* was discussed during the meeting, and based on the review of available information, it was agreed that submittal of a work plan by April 4, 2023, was not required.
- Received a request from the USEPA on March 27, 2023, to mail hard copies of select tables and figures from the *Previous Investigation Summary Report* (dated February 17, 2023) and to prepare two poster boards with figures depicting site features.
- Mailed hard copies of selected tables and figures to the USEPA on March 28, 2023, and requested from the USEPA source files of the figures needed to fulfill the request to prepare the poster boards.
- Submitted a *Response to Request for Expedited Work Plan* to the USEPA on March 28, 2023, addressing the request for a work plan to investigate the surrounding community from the southeastern portion of the site. The document summarized the team discussions during the March 21, 2023, scoping meeting and provided the justification that an *Expedited Work Plan* is not required.
- Discussed the proposal of a second meeting to be held in April 2023 to continue discussions on the site-specific objectives and requirements for the RI work plan, data gaps, potential sampling and analysis methods, and performance goals.
- 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 (April – June 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 ASAO.

- Prepare for the second RI/FS scoping meeting, pursuant to Section 6 (Meetings, Permits, and Reports) of the RI/FS SOW.
- 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.
- Prepare the RI work plan for submittal to the USEPA by July 21, 2023.

## Personnel and/or Project Changes

- Mr. Corey Averill has been assigned as the Arcadis Project Manager for the site. Arcadis remains as the supervising contractor for the project.

## Community Involvement

- The USEPA hosted a public meeting 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 CERCLA process. Hercules provided an informational booth at the meeting for participants to ask questions and receive project information.

## USEPA/MDEQ Support Needed

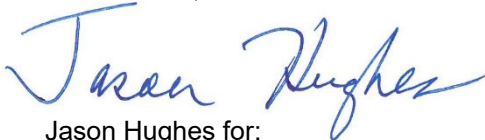
- Review the *Final Dense Non-Aqueous Phase Liquid Supplemental Investigation Report* submitted on July 29, 2020, incorporating new data and addressing USEPA comments on the draft version.
- Review the *Supplemental Groundwater Investigation Report* submitted on September 25, 2020, summarizing the assessment 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).

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- 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 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.
- Review the *Response to Request for Expedited Work Plan* submitted on March 28, 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. Corey Averill with Arcadis at 315-671-9224.

Sincerely,  
Arcadis U.S., Inc.



Jason Hughes for:

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Certified Project Manager

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