

**VIA ELECTRONIC MAIL**

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

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. Lloyd and Mr. Budeir:

This *Monthly Progress Report* summarizes the activities accomplished from April 1 through April 30, 2023, in order to comply with the 2011 Resource Conservation and Recovery Act (RCRA) 3013(a) Administrative Order, the 2014 RCRA 3008(h) Administrative Order on Consent, 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 April 2023**

- Received the source file for a figure via email from the U.S. Environmental Protection Agency (USEPA) on April 11, 2023. The file was needed to fulfill the request by the USEPA to prepare two poster boards depicting site features. Arcadis shipped the requested poster boards to the USEPA on April 25, 2023, and delivery was confirmed on April 27, 2023.

- Received a request via email from the USEPA on April 16, 2023, to help locate data submitted and/or referenced as part of the *Previous Investigation Summary Report* (dated February 17, 2023). On April 17, 2023, Arcadis provided the requested information, which included data in tabular format associated with surface water, soil, groundwater, and soil gas samples collected during the Phase I and Phase 2 Investigations at the site (i.e., sampling methodology, sampling intervals, total depths, analytical results) as well as information pertaining to the sewer replacement project along Providence Street (i.e., location of project area, as-built drawings).
- Participated in a virtual meeting with the USEPA and Mississippi Department of Environmental Quality (MDEQ) on April 18, 2023, that served as the second scoping meeting associated with development of the RI/FS Work Plan required in the CERCLA ASAO. During the meeting, the USEPA requested preparation and submittal of a vapor intrusion work plan by May 2, 2023, to evaluate potential risk associated with certain data gaps/uncertainties identified by the USEPA related to the potential migration of vapor along the pipe bedding of the sanitary sewer line into residences located along Providence Street, across from the southeast portion of the site.
- Received a follow-up email from the USEPA on April 18, 2023, with a document titled *EPA Request for VI Work Plan to address Data Gap/Uncertainties*. The document included the request for preparation and submittal of a vapor intrusion work plan and listed 11 points describing the data evaluation by the USEPA for environmental conditions near Area #1 (southeast portion of the site) to support the need for the supplemental vapor intrusion investigation.
- Submitted the *Monthly Progress Report* for March 2023 to the USEPA and MDEQ on April 19, 2023.
- The USEPA requested that Hercules notify the USEPA by April 21, 2023, of the intent to submit/not submit the work plan, such that the USEPA could make preparations to conduct the investigation, if necessary. Hercules provided confirmation via email on April 21, 2023, of the intent to prepare and submit the requested work plan by May 2, 2023.
- Received additional emails from the USEPA on April 24, April 25, and April 27, 2023, with supplemental input for consideration during preparation of the requested work plan.
- Completed preparations for conducting the 2023 first semiannual monitoring event in May 2023 in accordance with the agreement in the CERCLA ASAO, including the scopes for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Continued preparation of 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.
- 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 (May – July 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 and submit a *Soil Vapor and Sewer Gas Investigation Work Plan* by May 2, 2023, as requested by the USEPA, to address concerns regarding the potential migration of vapors from the groundwater along the pipe bedding of the sanitary sewer line into residences within the southeast portion of the site.
- Participate in follow-up conference calls to obtain approval of the requested work plan and initiate preparations for completion of the field work during the week(s) of May 22 and/or May 29, 2023, as requested by the USEPA.
- Conduct the 2023 first semiannual monitoring event during the weeks of May 1 and May 8, 2023, including the scopes for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs, as agreed in the CERCLA ASAO. In addition, the scope for Area #1 will be expanded to include collection of groundwater samples from additional monitoring wells in the area to support data evaluation to address the potential vapor intrusion concern associated with the sanitary sewer line.
- 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.
- Continue submission of ongoing USEPA Data Archival and ReTrieval electronic data deliverables.
- Continue preparation of the RI/FS Work Plan required in the CERCLA ASAO for submittal to the USEPA and MDEQ.

## Personnel and/or Project Changes

- Mr. Armed Raspberry has joined the MDEQ team for the site.

## Community Involvement

- None.

## 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* submitted on 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.

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- 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 comments by the USEPA 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 event 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.



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