

VIA ELECTRONIC MAIL

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Date: July 21, 2023

Our Ref: 30158342.0400

Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (June 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 June 1 through June 30, 2023, per 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 June 2023

- Submitted access agreement packages for each property owner located within the vapor intrusion investigation area adjacent to the southeast portion of the site on June 1, 2023. Hercules representatives subsequently assisted the U.S. Environmental Protection Agency (USEPA) representatives with contacting and visiting each property owner to facilitate execution of the residential access agreements.

- Participated in a virtual meeting with the USEPA and Mississippi Department of Environmental Quality (MDEQ) on June 2, 2023, to discuss the *Vapor Intrusion Investigation Work Plan* (VII Work Plan) submitted on May 23, 2023, the comments to that document provided by the USEPA on May 30, 2023, and the next steps for the site investigation.
- Submitted a *Response to Comment Letter* (RTC Letter) on June 2, 2023, to address USEPA's comments received on May 30, 2023, for the VII Work Plan (dated May 23, 2023) and incorporating the items discussed during the virtual meeting with the USEPA and MDEQ.
- Submitted revised elements of the VII Work Plan on June 6, 2023, that incorporated comments received from USEPA on May 30, 2023, and responses to those comments submitted to USEPA on June 2, 2023.
- Received an email from the USEPA with additional input for the vapor intrusion investigation on June 6, 2023. Following subsequent communications with the USEPA, a revised VII Work Plan for use during implementation of the field work was prepared and submitted to the USEPA on June 9, 2023.
- Conducted the vapor intrusion investigation field work during the weeks of June 12 and June 19, 2023, in accordance with the revised VII Work Plan (dated June 9, 2023). The USEPA and MDEQ participated and provided input during implementation of the field activities, and analytical results for groundwater and air samples were provided to the regulatory agencies on an expedited turn-around basis.
- Submitted a further revision to the VII Work Plan on June 12, 2023.
- Documented a field modification to the VII Work Plan related to the screened interval for GeoProbe groundwater sample collection in an email to the USEPA dated June 13, 2023.
- Submitted the *Monthly Progress Report* for May 2023 to the USEPA and MDEQ on June 20, 2023.
- Submitted a *Request for Extension of Due Date for RI/FS Work Plan* to the USEPA on June 23, 2023. The document includes a request for an extension of the due date for the RI/FS Work Plan from July 19, 2023, to at least August 31, 2023, due to the ongoing additional work associated with the vapor intrusion investigation that resulted in diverting resources from development of the RI/FS Work Plan to be responsive to USEPA's stated objective of an expedited vapor intrusion investigation.
- Initiated data evaluation for groundwater and surface water samples collected during the semiannual monitoring event conducted in May 2023, which included sampling under the Restrictive Use Agreed Order (RUAO), expanded Area #1 to support vapor intrusion investigation, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs, as agreed in the CERCLA ASAO.
- Continued with site maintenance activities (e.g., mowing, removal of vines and shrubs).

Challenges and/or Delays

- Preparation of the RI/FS Work Plan has been delayed due to the preparation of multiple versions of the VII Work Plans, access agreement packages, implementation of the vapor intrusion investigation activities, and evaluation and reporting of the investigation data (which is ongoing). As noted in the *Request for Extension of Due Date for RI/FS Work Plan*, the implementation of the expedited vapor intrusion investigation requested by USEPA, has necessitated the reallocation of project resources that would otherwise be dedicated to the preparation of the RI/FS Work Plan.

Tasks Planned for Next Three Months (July – September 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.

- Preparation and submitted of the *Vapor Intrusion Investigation Report* by August 4, 2023, as requested by the USEPA, instead of documenting the results of the vapor intrusion investigation in the RI/FS Work Plan as described in the VII Work Plan (dated June 12, 2023).
- Continue preparation of the RI/FS Work Plan required in the CERCLA ASAO for submittal to the USEPA and MDEQ (currently scheduled for submittal by August 31, 2023).

Personnel and/or Project Changes

- None.

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.
- 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

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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. In accordance with the CERCLA ASAO, review and approval of these documents from the USEPA and MDEQ is needed to develop the strategic approach for the preparation of the RI/FS Work Plan, incorporate the results of previous investigations into the objectives of the RI/FS activities, and outline the project specific requirements.
- Review the *Response to Request for Expedited Work Plan* submitted on March 28, 2023, in response to the request by the USEPA on March 21, 2023, to submit an Expedited Work Plan by April 4, 2023, to delineate the potential migration of constituents of interest in groundwater into the surrounding community from the southeast portion of the site.
- Review the *2022 Second Semiannual Consolidated Monitoring Report* submitted on May 3, 2023, summarizing the November 2022 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.
- Approval of the Final VII Work Plan (a revised version of which was submitted on July 11, 2023).
- Participate in another scoping meeting to continue discussions about next steps for the project and to ensure alignment of data gaps, potential sampling and analysis methods, and performance goals for development of the forthcoming RI/FS Work Plan.

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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