

VIA ELECTRONIC MAIL

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Date: September 20, 2023

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

- Submitted the *Vapor Intrusion Investigation Summary Report* to the U.S. Environmental Protection Agency (USEPA) and Mississippi Department of Environmental Quality (MDEQ) on August 7, 2023, documenting the results of the initial phase of the vapor intrusion investigation conducted between May 9 and June 22, 2023.
- Received two letters from the USEPA on August 14, 2023: one with subject *Hercules Inc. Superfund Site, Hattiesburg, MS: EPA Response to Hercules July 28, 2023 Letter, Vapor Intrusion Investigation, Vapor*

Intrusion Investigation Summary Document, Addendum to Vapor Intrusion Investigation Work Plan and Associated Activities, Remedial Investigation (RI)/Feasibility Study (FS) Work Plan (first letter); and the second letter with subject *EPA Administrative Concerns on the Hercules Vapor Intrusion Work Plan Dated June 9, 2023, and June 15, 2023, Hercules Site, Hattiesburg, MS* (second letter).

- Submitted the *Monthly Progress Report* for July 2023 to the USEPA and MDEQ on August 21, 2023.
- Received a letter from the USEPA on August 30, 2023, with subject *EPA comments on the Vapor Intrusion Investigation Summary Report submitted for early action at the Hercules Inc Superfund Site in Hattiesburg, Mississippi*.
- Submitted the *Addendum to the Vapor Intrusion Investigation Work Plan* to the USEPA and MDEQ on August 31, 2023, in accordance with the schedule requested by the USEPA.
- Continued preparation of the *2023 First Semiannual Consolidated Monitoring Report* documenting the semiannual monitoring event conducted in May 2023, which included sampling under the Restrictive Use Agreed Order (RUAO), Area #1 (which was expanded to support the vapor intrusion investigation), Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs in accordance with requirements in the RUA and RCRA Orders until the RI/FS Work Plan is approved, as agreed in the CERCLA ASAOC.

Challenges and/or Delays

- Preparation of the *RI/FS Work Plan* continues to be delayed due to the ongoing vapor intrusion investigation, which has included preparation of multiple versions of the *Vapor Intrusion Investigation Work Plan*, access agreement packages, implementation of the vapor intrusion investigation activities, and evaluation of the investigation data, preparation of the *Vapor Intrusion Investigation Summary Report* and preparation of the *Addendum to the Vapor Intrusion Investigation Work Plan* (Addendum to the VII Work Plan).
- The USEPA's August 14, 2023 letter requested that Hercules implement the next phase of the vapor intrusion investigation in early to mid-September 2023. Subsequently, the USEPA directed Hercules to postpone the next phase of the investigation until the agency has sufficient time to review and approve the *Addendum to the Vapor Intrusion Investigation Work Plan*. Hercules will not mobilize to the site to start the field work until the document is approved.
- Based on project team's communications (including counsel) and consensus, the USEPA's first letter on August 14, 2023, specified that the submittal date for the *RI/FS Work Plan* was extended to September 22, 2023; however, the due date was predicated on Hercules not needing to reallocate project resources that would otherwise be dedicated to the preparation of the *RI/FS Work Plan* to address requests by the USEPA to complete vapor intrusion investigation work in advance of the RI activities. The USEPA has requested implementation of a next phase of the vapor intrusion investigation activities and associated reporting prior to RI activities; therefore, an extension of the September 22, 2023, due date for submittal of the *RI/FS Work Plan* is appropriate to accommodate completion of the additional vapor intrusion investigation work.

Tasks Planned for Next Three Months (September – November 2023)

- Coordination and implementation of the next phase of the vapor intrusion investigation.
- Preparation of a Supplemental Vapor Intrusion Investigation Summary Report documenting the results of the next phase of the vapor intrusion investigation.

Ms. Diedre Lloyd and Mr. Maher Budeir
September 20, 2023

- Participate in a meeting with the USEPA and MDEQ to discuss preparation of the RI/FS Work Plan and obtain the input from the USEPA described in the CERCLA ASAOC (i.e., paragraph 6.1(b) of the Scope of Work), including site-specific objectives of the RI and the strategic approach, and to outline project specific requirements involving project objectives, data gaps, potential sampling and analysis methods, and performance goals.
- Submittal of the *2023 First Semiannual Consolidated Monitoring Report* summarizing the May 2023 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Continue preparation of the *RI/FS Work Plan* pending discussions with the USEPA and MDEQ during the requested working meeting.

Personnel and/or Project Changes

- None.

Community Involvement

- None.

USEPA/MDEQ Support Needed

- As listed in previous *Monthly Progress Reports*, there are multiple documents and correspondence associated with technical aspects of the project that require review by the agencies.
- The list of documents has been revised for this *Monthly Progress Report* to include only the more recent submittals, whose review by the USEPA and MDEQ will facilitate developing the strategic approach for the preparation of the RI/FS Work Plan required in the CERCLA ASAOC:
 - *Previous Investigation Summary Report* submitted on February 10, 2023.
 - *Conceptual Site Model Report* submitted on February 10, 2023.
 - *2022 Second Semiannual Consolidated Monitoring Report* submitted on May 3, 2023.
- As noted above, participation of the agencies in a working meeting is needed 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.



Corey Averill
Certified Project Manager

Ms. Diedre Lloyd and Mr. Maher Budeir
September 20, 2023

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