

VIA ELECTRONIC MAIL

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Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (September 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 between September 1 and September 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 September 2023

- Submitted a letter to the U.S. Environmental Protection Agency (USEPA) on September 8, 2023, with subject: *Response to USEPA’s August 14, 2023 Letter with Subject: Hercuyles Inc. Superfund Site, Hattiesburg, MS: EPA Response to Hercules July 28, 2023 Letter, Vapor Intrusion Investigation Summary Document, Addendum to Vapor Intrusion Investigation Work Plan and Associated Activities, Remedial Investigation (RI)/Feasibility Study (FS) Work Plan.*

- Participated in a conference call with the USEPA and Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on September 11, 2023, to discuss the *Addendum to the Vapor Intrusion Investigation Work Plan* submitted on August 31, 2023, for collection of indoor, crawl space, ambient, sewer manhole, and sewer cleanout air samples.
- Received a request from the USEPA on September 11, 2023, to provide the information received from the City of Hattiesburg regarding the sanitary sewer infrastructure for the residential neighborhood adjacent to the southeastern boundary of the site. The requested information was provided in a September 18, 2023 letter to USEPA, with subject: *Hercules Hattiesburg Facility – Hattiesburg, MS – Memorandum of Sewer As-Built Communications with City*.
- Provided a draft fact sheet to the USEPA on September 12, 2023, for review and use to facilitate communication of the results of the completed vapor intrusion investigation activities to the community.
- Received a request from the USEPA on September 12, 2023, to conduct an additional soil gas sampling event during the week of October 23, 2023, that would include re-sampling of the previously sampled properties for soil gas and collection of sewer gas samples from sanitary sewer manholes.
- Received a letter from the USEPA on September 13, 2023, with subject: *REVISED EPA 2nd comments on the Vapor Intrusion Investigation (VII) Summary Report submitted for early action at the Hercules Inc Superfund Site in Hattiesburg, Mississippi*.
- Conducted a site visit on September 19, 2023, to inspect and collect additional information on the configuration of the sanitary sewer for the residential neighborhood adjacent to the southeastern boundary of the site.
- Submitted the *Monthly Progress Report* for August 2023 to the Agencies on September 20, 2023.
- Submitted a letter to the USEPA on September 22, 2023, with subject: *Hattiesburg Site RI/FS Work Plan Development and Submittal*.
- Participated in a conference call with the Agencies on September 29, 2023, to discuss USEPA's request for a supplemental soil gas and sewer manhole gas sampling event.
- 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 ASOOC.

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, evaluation of the investigation data, preparation of the *Vapor Intrusion Investigation Summary Report*, preparation of an *Addendum to the Vapor Intrusion Investigation Work Plan*, addressing comments received from the USEPA, participation in multiple conference calls to discuss the next phase of the investigation, and preparation of a revised *Addendum to the Vapor Intrusion Investigation Work Plan* summarizing those discussions and agreements.

- Based on project team's communications (including counsel) and consensus, the USEPA's letter on August 14, 2023, specified that the submittal date for the *RI/FS Work Plan* was extended to September 22, 2023; however, that 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 additional requests by the USEPA to complete additional vapor intrusion investigation work in advance of the RI activities. As noted above, such requests for additional vapor intrusion investigation work were subsequently received from the USEPA.
- Due to ongoing project demands (e.g., preparation and submittal of revised the *Addendum to the Vapor Intrusion Investigation Work Plan*, coordination and implementation of the next phase of the vapor intrusion investigation, preparation and participation in pending project meetings to obtain alignment of data gaps, upcoming communications with the community to share results of completed activities) and communications with the USEPA, a new due for submittal of the *RI/FS Work Plan* is being discussed with the USEPA.

Tasks Planned for Next Three Months (October – December 2023)

- Submittal of responses to the USEPA August 14, 2023 letter with subject: *EPA Administrative Concerns on the Hercules Vapor Intrusion Work Plan Dated June 9, 2023 and June 15, 2023*.
- Continue discussions with the USEPA and MDEQ to obtain consensus on the next steps for the vapor intrusion investigation.
- Submittal of a *Revised Addendum to the Vapor Intrusion Investigation Work Plan* by October 13, 2023 (submitted).
- Submittal of responses to USEPA's September 13, 2023 comments on the *Vapor Intrusion Investigation Summary Report* by October 20, 2023.
- Coordination and implementation of the next phase of the vapor intrusion investigation, currently schedule for the week of November 6, 2023, pending approval by the USEPA of the *Revised Addendum to the Vapor Intrusion Investigation Work Plan* submitted October 13, 2023.
- Coordination and implementation of the next semiannual monitoring event in accordance with requirements in the RUAO and RCRA Orders until the *RI/FS Work Plan* is approved, as agreed in the CERCLA ASAO.
- Preparation of a *Supplemental Vapor Intrusion Investigation Summary Report* addressing comments from the USEPA and documenting the results of the next phase of the vapor intrusion investigation.
- Participate in a meeting with the Agencies to discuss preparation of the *RI/FS Work Plan* and obtain the input from the USEPA described in the CERCLA ASAO (i.e., paragraph 6.1(b) of the Statement 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* in accordance with discussions with the USEPA and MDEQ during the requested working meeting, and correspondence received from MDEQ on October 3, 2023, and letters received from the USEPA on October 12, 2023 containing comments on the *Previous Investigation Summary Report* and the *Conceptual Site Model Report*, both submitted by Hercules on February 10, 2023.

Personnel and/or Project Changes

- None.

Community Involvement

- The USEPA indicated that a draft letter would be sent to Hercules for review and comment, which will present the results of the initial phase of the vapor intrusion investigation and the scope of the next phase of the vapor intrusion investigation to the property owners for the residential neighborhood adjacent to the southeastern boundary for the site. To assist with such communications, Hercules provided a draft Fact Sheet to USEPA on September 12, 2023 for consideration.

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.
- Participation of the Agencies in working meetings 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

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