

VIA ELECTRONIC MAIL

Ms. Diedre Lloyd
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Mr. Maher Budeir
Corrective Action Section
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Mail Code: 9T25
Atlanta, Georgia 30303-8960

Arcadis U.S., Inc.
One Lincoln Center
110 West Fayette Street
Suite 300
Syracuse
New York 13202
Phone: 315 446 9120
Fax: 315 449 0017
www.arcadis.com

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

The following summary is intended to memorialize significant activities (e.g., conference calls, technical deliverables, correspondence) performed throughout the reporting period, and is not intended to capture all of the extensive email correspondence between the U.S. Environmental Protection Agency (USEPA) and Hercules over the current month.

- Submitted an email to the USEPA on October 2, 2023, with responses to the USEPA's summary of the conference call held on September 29, 2023. The email also laid out Hercules understanding of the USEPA's requests related to the next phase of the vapor intrusion investigation. The USEPA provided a response via email on the same day.
- Participated in a conference call with the Mississippi Department of Environmental Quality (MDEQ) and the USEPA (together, the Agencies) on October 2, 2023. The call was used to continue discussing USEPA's request for a supplemental soil gas and sewer manhole gas sampling event, and the next steps for the vapor intrusion investigation. An email summary of that call was provided to the USEPA on October 5, 2023, and USEPA provided an email response on October 6, 2023.
- Received a letter from the MDEQ on October 3, 2023, with subject: *Former Hercules Facility Previous Investigation Summary Report, Dated: February 10, 2023, Hattiesburg, Mississippi, Forrest County; Former Hercules Facility Conceptual Site Model Report, Dated: February 10, 2023, Hattiesburg, Mississippi, Forrest County; Former Hercules Facility 2022 Second Semiannual Consolidated Monitoring Report, Dated: May 3, 2023, Hattiesburg, Mississippi, Forrest County*. The review of those three documents generated no comments by the MDEQ.
- Received a letter from the USEPA on October 4, 2023, in response to Hercules' letter submitted on September 22, 2023. In that letter, the USEPA specified a deadline for submittal of the *RI/FS Work Plan* of December 4, 2023.
- Submitted a letter to the USEPA on October 6, 2023, with subject: *Response to 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*.
- Received a letter from the USEPA on October 12, 2023, with subject: *EPA comments on the Previous Investigation Summary Report (PISR) for the Hercules Inc. Superfund Site in Hattiesburg, Mississippi, submitted pursuant to the Administrative Settlement Agreement and Order on Consent (AOC)*.
- Received a letter from the USEPA on October 12, 2023, with subject: *EPA comments on the Conceptual Site Model (CSM) for the Hercules Inc. Superfund Site in Hattiesburg, Mississippi*.
- Submitted the *Revised Addendum to the Vapor Intrusion Investigation Work Plan* on October 13, 2023, as requested by the USEPA.
- Received a draft/example letter from the USEPA on October 18, 2023, with subject: *Sampling results and next steps for [ADDRESS], adjacent to the Hercules Inc. Superfund Site in Hattiesburg, Mississippi*. The draft letter was submitted for comment by Hercules and intended to be shared with the property owners and tenants whose properties were sampled in June 2023 during the initial phase of the vapor intrusion investigation. Hercules provided comments on this letter to the USEPA on October 20, 2023, and also provided and updated draft Fact Sheet for consideration (updated version from the original provided on September 12, 2023). The USEPA submitted a final version of the letter to Hercules on October 24, 2023.
- Submitted the *2023 First Semiannual Consolidated Monitoring Report* on October 19, 2023, summarizing the May 2023 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, Northeast Delineation, and Hattiesburg Formation monitoring programs.
- Submitted the *Monthly Progress Report* for September 2023 to the Agencies on October 20, 2023.
- Submitted a letter to the USEPA on October 20, 2023, with subject: *Hercules Response to USEPA's August 30, 2023 and September 13, 2023 Revised Comments on the Vapor Intrusion Investigation (VII) Summary Report*.

- Submitted detailed agendas to the USEPA for the technical meeting requested by Hercules to discuss development of the *RI/FS Work Plan*, and for the management meeting requested by Hercules to discuss administrative topics for the project. The agendas were provided on October 20, 2023.
- Received a letter from the USEPA on October 25, 2023, with subject: *EPA Comments on the Vapor Intrusion Investigation Revised Vapor Intrusion Work Plan Addendum, Hercules Inc. Superfund Site in Hattiesburg, Mississippi*. A revised version of the letter was received on October 26, 2023, with two additional comments.
- Participated in a conference call with the Agencies on October 26, 2023, to discuss the *Revised Addendum to the Vapor Intrusion Investigation Work Plan* submitted by Hercules on October 13, 2023, and the USEPA's comments received on October 25 and October 26, 2023.
- Submitted a letter to the USEPA on October 27, 2023, with subject: *Responses to Select Technical Items Discussed During October 26, 2023 Conference Call*. The USEPA provided an email response later that same day.
- Initiated preparations for completion of the 2023 second semiannual monitoring event to be completed in November 2023, which will include the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs in accordance with requirements in the RUAO and RCRA Orders until the *RI/FS Work Plan* is approved, as agreed in the ASAOC.

Challenges and/or Delays

- Preparation of the *RI/FS Work Plan* has been delayed due to the USEPA's prioritization of 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* and a *Revised Addendum to the Vapor Intrusion Investigation Work Plan* addressing comments received from the USEPA, an participation in multiple conference calls to discuss the next phase of the vapor intrusion investigation.
- Based on project team's communications and the USEPA's letter received on October 4, 2023, the submittal date for the *RI/FS Work Plan* was extended to December 4, 2023.

Tasks Planned for Next Three Months (November 2023 – January 2024)

- Continue discussions with the Agencies to obtain consensus on the next steps for the vapor intrusion investigation, and incorporate those discussions into a revised version of the *Revised Addendum to the Vapor Intrusion Investigation Work Plan* (submitted October 13, 2023) for approval.
- Coordination and implementation of the next phase of the vapor intrusion investigation, pending approval by the USEPA of the *Revised Addendum to the Vapor Intrusion Investigation Work Plan*.
- Coordination and implementation of the 2023 second semiannual monitoring event in accordance with requirements in the RUAO and RCRA Orders.
- 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 input from the USEPA on the 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, as described in the ASAOC (i.e., paragraph 6.1(b) of the Statement of Work).

- Complete preparation and submittal of the *RI/FS Work Plan* in accordance with discussions with the Agencies during the requested working meeting, correspondence received from MDEQ on October 3, 2023, and letters received from the USEPA on March 21, 2023 (agenda for scoping meeting), April 18, 2023 (request for vapor intrusion investigation) and October 12, 2023 (comments on the *Previous Investigation Summary Report* and the *Conceptual Site Model Report*).

Personnel and/or Project Changes

- None.

Community Involvement

- The USEPA issued a letter to the property owners for the residential neighborhood adjacent to the southeastern boundary for the site on October 25, 2023. The letter presents the results of the initial phase of the vapor intrusion investigation and the scope of the next phase of the vapor intrusion investigation. The draft Fact Sheet provided by Hercules for consideration was not included as part of the distributed material.

USEPA/MDEQ Support Needed

- Participation of the Agencies in working meetings is requested to continue discussions about next steps for the project and to ensure alignment of data gaps, potential sampling and analysis methods, and performance goals.

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

Email: Corey.Averill@arcadis.com
Direct Line: 315-671-9224

CC. Cassandra Johnson – MDEQ, Jackson, MS (electronic)
Thomas Wallace – MDEQ, Jackson, MS (electronic)
Chrissy Piechoski – Hercules, Wilmington, DE (electronic)
Timothy Hassett – Hercules, Wilmington, DE (electronic)
Gloria Tatum – Tatum & Associates, Jackson, MS (electronic)