

**VIA ELECTRONIC MAIL**

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Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (November 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 November 1 and November 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 November 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 email correspondence between the U.S. Environmental Protection Agency (USEPA) and Hercules over the current month.

- Participated in a conference call with the Mississippi Department of Environmental Quality (MDEQ) and the USEPA (together, the Agencies) on November 3, 2023, to discuss the strategic approach and site-specific objectives for development and submittal of the *RI/FS Work Plan*.
- Completed the 2023 second semiannual monitoring event between November 6 and November 17, 2023, which included the monitoring scope specified in the Restrictive Use Agreed Order (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. These monitoring events will be performed until the *RI/FS Work Plan* is approved, as agreed in the ASAOC.
- Received a letter from the USEPA on November 14, 2023, with subject: *EPA response to Hercules email correspondence dated November 9, 2023, inclusive of email chain from October 13, 2023, to November 9, 2023*.
- Submitted an email to the USEPA on November 17, 2023, with responses to two technical items (i.e., lithology and soil gas probe screened intervals) identified in the USEPA's November 14, 2023 correspondence regarding the *Revised Addendum to Vapor Intrusion Investigation Work Plan*.
- Submitted the *Monthly Progress Report* for October 2023 to the Agencies on November 20, 2023.
- Participated in a conference call with the USEPA on November 21, 2023, that included members of USEPA management, legal counsel, and technical teams for the project. The call was used to discuss perceived technical and procedural differences between the USEPA and Hercules teams, and to obtain input and consensus on steps to continue making progress with the objectives of the ASAOC.
- Received emails from the USEPA on November 22, 2023, including copies of the legal and technical PowerPoint presentations utilized by the USEPA during the November 21, 2023 conference call.
- Submitted the *Revised Addendum to Vapor Intrusion Investigation Work Plan* on November 27, 2023, as discussed with the USEPA. The document describes the proposed scope for the next phase of the vapor intrusion investigation and indicated a mobilization date of December 4, 2023 for field implementation, as requested by the USEPA.
- Received an email from the USEPA on November 28, 2023, indicating that the USEPA does not approve field mobilization for implementation of the next phase of the vapor intrusion investigation on December 4, 2023, due to time constraints to review the *Revised Addendum to Vapor Intrusion Investigation Work Plan* and notify the community of the upcoming work.

## Challenges and/or Delays

- Based on project team 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 (December 2023 – February 2024)

- Submittal of the *RI/FS Work Plan* (completed on December 4, 2023, as required by the USEPA).
- Continue discussions with the Agencies to obtain consensus on the next steps for the vapor intrusion investigation and incorporate those discussions into a further revision of the *Revised Addendum to the Vapor Intrusion Investigation Work Plan*, to be submitted to the Agencies by December 15, 2023) for approval.

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- Coordination and implementation of the next phase of the vapor intrusion investigation (currently targeting mobilization on January 8, 2024), pending approval by the USEPA of the *Revised Addendum to the Vapor Intrusion Investigation Work Plan*.
- 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 the contents of the *RI/FS Work Plan* and obtain approval for implementation.
- Prepare the RI Deliverables specified in Section 4.5 of the Statement of Work (Appendix B of the ASAO).
- Initiate management and evaluation of the data for the 2023 second semiannual monitoring event completed in November 2023 in accordance with requirements in the RUAO and RCRA Orders.

## Personnel and/or Project Changes

- None.

## Community Involvement

- The USEPA issued letters to the property owners for the residential neighborhood adjacent to the southeastern boundary for the site on October 24 and 25, 2023. The letter presented the results of the initial phase of the vapor intrusion investigation and the scope of the next phase of the vapor intrusion investigation.

## USEPA/MDEQ Support Needed

- Hercules and the Agencies continue to participate in working meetings to discuss technical aspects of the vapor intrusion investigation and the *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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Certified Project Manager

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

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