

VIA ELECTRONIC MAIL

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Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (January 2024)

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 January 1 and January 31, 2024, 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 January 2024

The following summary is intended to memorialize significant activities (e.g., field work, 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.

- Received a letter from the USEPA on January 3, 2024, with subject: *EPA Addendum, Hercules/Arcadis Revised Vapor Intrusion Investigation Work Plan Addendum Submitted on December 29, 2023, Hercules, Inc. Superfund Site, Hattiesburg, Mississippi*. The document requested submittal of revisions to the addendum to the work plan by January 4, 2024.
- Submitted the requested revisions to the *Revised Addendum to Vapor Intrusion Investigation Work Plan* on January 4, 2024. Also submitted an email to the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on the same day notifying the project team of the weather forecast (i.e., anticipated precipitation) for the week of January 8, 2024, when field work was expected to commence, and potential implications on the scheduled field work. The USEPA requested that field mobilization would proceed as planned for installation of the temporary piezometer and soil gas sample probes, and deployment of sewer manhole passive samplers; however, collection of soil gas samples would be subject to observed soil conditions (i.e., saturated soils) and measured water-level elevations.
- Received a letter from the USEPA on January 5, 2024, with subject: *EPA Conditional Approval for: January 4, 2024 submittal of the Revised Addendum to the Vapor Intrusion Investigation Work Plan, Hercules, Inc. Superfund Site, Hattiesburg, Mississippi and for the January 4, 2024 submittal of the Redline Strikeout Revised Addendum to the Vapor Intrusion Investigation Work Plan, Hercules, Inc. Superfund Site, Hattiesburg, Mississippi*.
- Began implementation of the *Revised Addendum to Vapor Intrusion Investigation Work Plan* during the week of January 8, 2024: completed installation of temporary piezometer, collected lithological cores for soil descriptions, selected screened intervals and installed soil gas points as instructed by the USEPA, located sanitary sewer lateral service connections at each property, completed a photographic survey of crawl space construction, and deployed passive samplers for collection of sewer gas samples.
- Received an email from the USEPA on January 8, 2024, notifying the project team that the meeting scheduled for January 17, 2024, to discuss the December 4, 2023 *RI/FS Work Plan*, and facilitate review of the document and subsequent approval for implementation, needed to be rescheduled for February 2024 (meeting has been rescheduled for February 28, 2024).
- Submitted an email to the USEPA on January 11, 2024, documenting a verbally agreed-upon modification to the soil gas sample probe installation procedures. The USEPA provided approval via email of the proposed modification on January 12, 2024.
- Participated in a conference call with the Agencies on January 12, 2024, to discuss completed activities and next steps for the vapor intrusion investigation.
- Continued implementation of the *Revised Addendum to Vapor Intrusion Investigation Work Plan* during the week of January 15, 2024: collected the remaining lithological cores for soil descriptions, selected remaining screened intervals and installed remaining soil gas points as instructed by the USEPA, collected soil gas samples from six properties and two ambient air samples, collected one equipment rinsate blank, and retrieved the passive samplers for collection of sewer gas samples.
- Submitted the *Monthly Progress Report* for December 2023 to the Agencies on January 19, 2024.
- Submitted an update on the vapor intrusion investigation to the USEPA via email on January 26, 2024. The update included a summary of the work completed to date, a list of remaining tasks to be completed, a description of the discussions/agreements between the USEPA and the field team, and recommendations for path forward.

- Submitted an email to the USEPA on January 28, 2024, providing the laboratory analytical data report for the equipment blank and trip blank samples collected as part of the vapor intrusion investigation.
- Initiated preparation of the RI Deliverables specified in Section 4.5 of the Statement of Work (Appendix B of the ASAO).
- Continued preparation of the *2023 Second Semiannual Consolidated Monitoring Report*, summarizing the November 2023 sampling events for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs, as agreed in the ASAO.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (February – April 2024)

- Receive and share data with the Agencies for collected soil gas, ambient air, and sewer gas samples for the vapor intrusion investigation.
- Complete the remaining tasks for the vapor intrusion investigation. Collection of remaining soil gas samples is dependent on weather conditions and depth-to-groundwater levels at the site.
- Initiate preparation of a *Supplemental Vapor Intrusion Investigation Summary Report* addressing previous comments from the USEPA and documenting the results of the next phase of the vapor intrusion investigation. As agreed with the USEPA, the report will be due six weeks following the final field activity.
- Participate in a meeting with the Agencies to discuss the December 4, 2023 *RI/FS Work Plan*, and facilitate review of the document and subsequent approval for implementation. The meeting has been scheduled in Jackson, Mississippi, for February 28, 2024.
- Continue preparation of the RI Deliverables specified in Section 4.5 of the Statement of Work (Appendix B of the ASAO).
- Finalize and submit the *2023 Second Semiannual Consolidated Monitoring Report* summarizing the November 2023 sampling events for the RUAO, Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs.

Personnel and/or Project Changes

- None this period.

Community Involvement

- The USEPA made calls during the week of January 1, 2024, to remind the property owners about implementation of the next phase of the vapor intrusion investigation during the week of January 8, 2024.

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*.

Ms. Diedre Lloyd and Mr. Maher Budeir
February 19, 2024

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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