

**VIA ELECTRONIC MAIL**

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Subject: Hercules Hattiesburg Facility – Hattiesburg, MS – Monthly Progress Report (February 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 February 1 and February 29, 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 February 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.

- Submitted an email to the USEPA on February 1, 2024, requesting an extension of 30 days for submittal of Financial Assurance required under the ASAOC. The USEPA provided a response that same day requesting a formal letter request for the extension. Hercules subsequently submitted a letter to USEPA on February 5, 2024, providing the required Financial Assurance in the form of a surety bond.
- Conducted a visit to the site on February 5, 2024, and measured depth-to-groundwater levels in select monitoring wells to evaluate feasibility of collecting the remaining soil gas samples described in the *Revised Addendum to Vapor Intrusion Investigation Work Plan* (dated January 4, 2024). Based on the measurements, the soil gas samples were not collected.
- Submitted an email to the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on February 6, 2024, providing the laboratory analytical data reports for the soil gas, ambient air, and sewer gas samples collected in January 2024 as part of the vapor intrusion investigation. The email also included summary tables with the data compared to the USEPA Vapor Intrusion Screening Levels (VISLs) and a summary of the depth-to-groundwater measurements collected on February 5, 2024. On February 7, 2024, the USEPA submitted an email inquiring if the date for final soil gas sampling had been determined. A response was submitted that same day indicating that the criterion agreed upon by USEPA and Arcadis in the field (i.e., a depth-to-groundwater level of at least seven feet below grade) had not been achieved and that Arcadis would return to the site to install a transducer to monitor depth-to-groundwater levels and progress toward achievement of the agreed-upon criterion.
- Conducted a follow up visit to the site on February 8, 2024, and deployed a transducer and telemetry system in the recently installed piezometer TP-18. The instrumentation was installed to gather depth-to-groundwater levels and transmit the data to further support decisions on timing to complete the soil gas sample collection activities.
- Provided a preliminary agenda via email on February 8, 2024, for the technical meeting scheduled for February 28, 2024, to discuss the *Remedial Investigation/Feasibility Study Work Plan (RI/FS Work Plan)*; submitted December 4, 2023). Subsequently, the USEPA, Hercules, and Arcadis exchanged a series of communications related to the February 28, 2024 technical meeting, including:
  - The USEPA provided a response on February 13, 2024, which: (1) included information regarding USEPA staff participation (i.e., in-person and remote); (2) requested an adjustment to the preliminary agenda to accommodate remote risk assessor participation during a specific time slot; and (3) indicated that the *RI/FS Work Plan* was under review and that the USEPA would be providing discussion topics prior to the meeting in lieu of comments on the *RI/FS Work Plan*.
  - Hercules provided a response on February 15, 2024, acknowledging USEPA's request and inquiring if the USEPA could provide preliminary thoughts about the *RI/FS Work Plan* prior to the meeting.
  - Received a follow up email from the USEPA on February 15, 2024, requesting an update on the anticipated submittal of the *Quality Assurance Project Plan*, which will include the Data Quality Objectives (DQOs) for the RI of the site.
  - The Hercules team provided a response on February 15, 2024, including a revised agenda for the February 28, 2024 meeting and suggested to include discussion of the project DQOs as part of the meeting. In addition, Hercules requested that the USEPA provide any feedback on the *RI/FS Work Plan* by February 21, 2024, in order to have adequate time to prepare for addressing the feedback and ensure a productive meeting.

- The USEPA provided an email on February 26, 2024, including logistical questions about the February 28, 2024 meeting, and requested Hercules to bring two entire copies of the *RI/FS Work Plan* to the meeting. Responses to the questions were provided via email on the same day. Subsequently, received a second email from the USEPA with proposed revisions and adjusting the order of the agenda for the meeting. Arcadis provided a response to USEPA's email that same day and the USEPA provided comments on the proposed agenda for the February 28, 2024 meeting.
- Received an email from the USEPA on February 16, 2024, relating a call USEPA had received from the owner of the property at 134 West 8<sup>th</sup> Street indicating that the sanitary sewer was backing up into his house following the vapor intrusion investigation activities performed in January 2024. That same day, Arcadis received a call from the property owner providing similar information and requesting assistance. Over the ensuing weeks, the USEPA, Hercules, and Arcadis engaged in a series of discussions including the following:
  - On February 20, 2024, Arcadis submitted an email to the USEPA providing documentation of the vapor intrusion investigation activities, including the location of the sanitary sewer line and the measures taken to avoid impacting that line.
  - The USEPA forwarded the documentation provided by Arcadis to the City of Hattiesburg on February 23, 2024, following a call with Ms. Ann Jones of the City of Hattiesburg during which the USEPA requested assistance by the City of Hattiesburg in investigating whether the assumed obstruction is located on City of Hattiesburg property.
  - Received a follow-up email from the USEPA on February 26, 2024, relating the substance of USEPA's discussions with Ms. Ann Jones of the City of Hattiesburg and requesting that Hercules perform additional investigations to rule out the possibility that the vapor intrusion investigation activities impacted the residential sewer line.
  - This topic was discussed during the February 28, 2024 technical meeting. During that meeting, Hercules and Arcadis committed to have a subcontractor visit the property to determine the nature and location of the assumed obstruction.
  - On February 29, 2024, a Hercules subcontractor determined that the blockage was due to roots in the sewer line and sanitary wipes that were obstructing the flow of the sewer line. The contractor removed the wipes to restore the flow. Finally, the contractor confirmed that the sewer blockage was not related to the vapor intrusion investigation activities.
- Submitted the *Monthly Progress Report* for January 2024 to the Agencies on February 19, 2024.
- Submitted an email to the USEPA on February 26, 2024, providing a data summary table for monitoring wells MW-129S and MW-129D in response to a prior inquiry by the property owner of 129 West 8<sup>th</sup> Street.
- Submitted an email to the USEPA on February 26, 2024, providing: (1) data summary figures for the vapor intrusion investigation; (2) calculations of potential excess lifetime cancer risk and non-cancer hazard indices for the vapor intrusion investigation data using the USEPA's VISL calculator; and (3) depth to water measurements from the transducer deployed in piezometer TP-18.
- Participated in a meeting with the Agencies in Jackson, Mississippi, on February 28, 2024, to discuss the *RI/FS Work Plan* (submitted on December 4, 2023) and facilitate review of the document and subsequent approval for implementation. During the meeting, the MDEQ shared a publication titled "*Solid-phase Geochemical Survey of the State of Mississippi; an Atlas Highlighting the Distribution of As, Cu, Hg, Pb, Se, and Zn in Stream Sediments and Soils*", while the USEPA shared a document titled "*USEPA Region 4*

*Superfund & Emergency Management Division QAPP Checklist/Potentially Responsible Party (PRP) or Other Project Received in Non-Uniform Federal Policy (UFP) Format".*

- Continued preparation of the RI Deliverables specified in Section 4.5 of the Statement of Work (Appendix B of the ASAOC).
- 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 ASAOC.

## Challenges and/or Delays

- None this period.

## Tasks Planned for Next Three Months (March – May 2024)

- Continue to monitor depth-to-groundwater levels in TP-18 to determine a date for completion of the remaining soil gas sampling tasks for the vapor intrusion investigation.
- 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. It was previously agreed with the USEPA that the report will be due six weeks following the final field activity; however, during the February 28, 2024 meeting, the USEPA requested an interim report to document the work completed in January 2024.
- Finalize and submit seven RI Deliverables specified in Section 4.5 of the Statement of Work (Appendix B of the ASAOC), including: the *Sampling and Analysis Plan*, the *Data Management Plan*, the *Field Sampling Plan*, the *Emergency Response and Notification Plan*, the *Health and Safety Plan*, the *Quality Assurance Project Plan*, and a *Reuse Assessment*.
- 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.
- Receive, review, and respond to anticipated USEPA and MDEQ comments on the December 4, 2023 *RI/FS Work Plan*.

## Personnel and/or Project Changes

- None this period.

## Community Involvement

- The City of Hattiesburg, Hercules, and the USEPA cooperated with the property owner at 134 West 8<sup>th</sup> Street who indicated that they were having issues with the sanitary sewer backing up into his residence which he believed was potentially related to the vapor intrusion investigation work completed at his property in January 2024. As noted above, a Hercules subcontractor determined that the blockage was due to roots and sanitary wipes. The subcontractor confirmed that the sewer blockage was not related to the vapor intrusion

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investigation activities and the issue was addressed by February 29, 2024 (removed wipes that were obstructing sewer flow).

- The property owner for 129 West 8<sup>th</sup> Street inquired about groundwater data for monitoring wells MW-129S and MW-129D which are located on his property. Hercules provided a summary data table via email to the USEPA on February 26, 2024, in response to the inquiry.

## USEPA/MDEQ Support Needed

- Hercules is awaiting the USEPA and MDEQ comments on the December 4, 2023 *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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