

VIA ELECTRONIC MAIL

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Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
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Date: February 20, 2025

Subject: **Monthly Progress Report (January 2025) – Former Hercules Facility, Hattiesburg, MS**

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

Our Ref: 30251700.0400

Dear Ms. Johnston and Mr. Budeir:

This *Monthly Progress Report* summarizes the activities accomplished between January 1 and January 31, 2025, per the 2011 Resource Conservation and Recovery Act (RCRA) 3013(a) Administrative Order, the 2014 RCRA 3008(h) Administrative Order on Consent, and the 2022 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Administrative Settlement Agreement and Order on Consent (ASAO) 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 2025

The following summary is intended to document 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 that same period.

- Participated in a conference call with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on January 14, 2025, to define the next steps and approach to complete revisions to the *Remedial Investigation/Feasibility Study Work Plan* (RI/FS Work Plan) submitted on December 4, 2023, and the seven RI Deliverables submitted in March 2024.
 - An email was provided on January 16, 2025, summarizing the agreement to proceed with the “Expedite Resubmittal of RI/FS Work Plan” approach. Under this approach, the USEPA team will review the documents submitted to date per the ASAOC (e.g., *Conceptual Site Model Report, RI/FS Work Plan, Field Sampling Plan*), and Hercules will prepare and submit a Revised RI/FS Work Plan that incorporates updated screening criteria, USEPA feedback provided during recent Operable Unit- (OU-)specific scoping calls, and the results of the recently completed vapor intrusion investigation activities.
 - The working schedule developed with concurrence from the USEPA to follow this approach is included as **Attachment A**.
 - The OU approach will be incorporated into the Revised RI/FS Work Plan in part and then fully in the subsequent Remedial Investigation Report, once the new data are available and the conceptual site model is updated. It is anticipated that the RI will be iterative in nature, and the results of the initial investigation activities proposed in the Revised RI/FS Work Plan will be used to identify potential remaining data gaps that may need to be addressed under subsequent mobilizations, to be discussed with the Agencies and approved by the USEPA.
- Submitted the *Monthly Progress Report* for December 2024 to the Agencies on January 21, 2025.
- Received a letter from the USEPA dated January 23, 2025 with subject: *Modification of Deliverable Requirements for the Remedial Investigation and Feasibility Study for the Hercules Inc. Superfund Site in Hattiesburg, Mississippi*. The letter indicated the following:
 - A *Sampling and Analysis Plan* is no longer required, as the Revised RI/FS Work Plan, Revised Field Sampling Plan (FSP), and Revised Quality Assurance Project Plan (QAPP) will satisfy the substantive requirements of that document.
 - The USEPA requested development of Field Sampling Plans specific to each OU to detail the work proposed in each OU; however, additional discussion is needed as this request conflict with agreements made in August 2024, which indicated that the OU approach will be incorporate into a single Revised Field Sampling Plan covering all the OUs.
- Initiated preparation of the 2024 Second Semiannual Consolidated Monitoring Report to document the results of the sampling event conducted in November 2024, which included the scope for the Restrictive Use Agreed Order (RUAO), Area #1, Area #2, Area #3, Poly Pale™ Area, and Northeast Delineation monitoring programs in accordance with the agreement in the ASAOC, and requirements in the RUAO and RCRA Orders for the site.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (February – April 2025)

- Initiate activities to support revisions to the *RI/FS Work Plan* and RI Deliverables with a teleconference with the Agencies to review the site history and conceptual site model (this teleconference was held on February 4, 2025).
- Participate in a second teleconference to provide an overview of how the Revised RI/FS Work Plan will be prepared to the new USEPA team members, and the anticipated preliminary scope to be proposed in the document. This second teleconference is scheduled for February 21, 2025.
- Continue discussions with the Agencies to consolidate the various financial assurance requirements for the site, and alternatives to optimize the groundwater monitoring program currently being performed in accordance with the agreement in the ASAOC, and requirements in the RUAO and RCRA Orders.

Personnel and/or Project Changes

- Ms. Xiamara Santiago Maldonado was introduced as a new Remediation Project Manager for the USEPA project team during a conference call on January 14, 2025.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Hercules received comments from the USEPA on the QAPP on November 11, 2024. Hercules is awaiting comments or approval from the Agencies of the remaining RI Deliverables submitted in March 2024. The following table summarizes the status of the USEPA review of the RI Deliverables:

RI Deliverable	Submittal Date	Comments from USEPA/MDEQ	Notes
QAPP	3/29/2024	11/5/2024	Essential for the RI phase. Approval required prior to RI implementation. Hercules to revise the QAPP following identification and agreement regarding OU-specific DQOs.
<i>Emergency Response and Notification Plan</i>	3/6/2024	Requested by 5/19/25	The project team agreed that finalizing this document is not essential prior to initiating the RI phase. The Agencies will review and provide comments, as applicable.
<i>Data Management Plan (DMP)</i>	3/6/2024	Requested by 4/21/25	Essential for the RI phase. Approval required prior to RI implementation

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RI Deliverable	Submittal Date	Comments from USEPA/MDEQ	Notes
<i>Health and Safety Plan</i>	3/6/2024	Requested by 4/21/25	Essential for the RI phase. The Agencies will review and provide comments, if needed, prior to RI implementation.
FSP	3/29/2024	Requested by 4/21/25	Essential for the RI phase. Approval required prior to RI implementation
<i>Reuse Assessment</i>	3/29/2024	Requested by 5/19/25	The project team agreed that finalizing this document is not essential prior to initiating the RI phase. The Agencies will review and provide comments, as applicable.

- Hercules is awaiting comments or approval of the following documents submitted to the Agencies:
 - Draft fact sheet submitted on June 3, 2024. The document was provided to support sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area.
 - The *2023 Second Semiannual Consolidated Monitoring Report* submitted on June 7, 2024. The document summarized the results of the November 2023 sampling event.
 - The *2024 First Semiannual Consolidated Monitoring Report* submitted on November 15, 2024. The document summarized the results of the May 2024 sampling event.
 - The *2023 & 2024 Vapor Intrusion Investigation Summary Report* submitted on November 22, 2024. The document summarized the results of the vapor intrusion investigation activities conducted between May 2023 and September 2024, as requested by the USEPA.

The Hercules team appreciates your support with this project. If there are any questions concerning this submittal, please contact the Project Coordinator, Ms. Chrissy Piechoski at 302-647-9798, 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
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- 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)

Attachment A

RI/FS Working Schedule

Attachment A
Working Schedule - Remedial Investigation/Feasibility Study Approach
Monthly Progress Report (January 2025)
Hercules Inc. Superfund Site
Hattiesburg, Mississippi



Task	Responsible Party	Duration (Working Days)	Duration (Months)	Predecessor Task	Start	Finish	Status	Key Assumptions/Comments
December 4, 2023 RI/FS Work Plan and RI Deliverables								
0 Decide on Path Forward	USEPA/MDEQ/Hercules	1	---	---	1/14/25	1/14/25	Complete	
1 Overview of Site and Conceptual Site Model (CSM)	Hercules	1	---	0+14d	2/4/2025	2/4/2025	Complete	- Presentation of Site history and CSM to new members in the USEPA team.
2 Overview of Proposed Scope in RI/FS Work Plan	Hercules	1	---	---	2/21/2025	2/21/2025		- Presentation of proposed scope in the 12/4/23 RI/FS Work Plan to new members in the USEPA team. 4 hour duration for teleconference.
3 Issue Letter - SAP Not Required	USEPA/MDEQ	--	--	---	2/24/2025	1/23/2025	Complete	- USEPA is no longer requiring a SAP and will issue letter as SAP is requirement in ASAOC. USEPA provided letter on 1/23/2025.
4 Review and Comment on DMP and FSP	USEPA/MDEQ	40	2.0	1, 2	2/24/2025	4/21/2025		- Both documents critical for the RI phase. Submitted in March 2024. Approval required prior to RI implementation.
5 Review and Comment on HASP	USEPA/MDEQ	40	2.0	1, 2	2/24/2025	4/21/2025		- Critical for the RI phase. Submitted in March 2024. The USEPA/MDEQ will review and provide comments, if needed, prior to RI implementation.
6 Review and Comment on ERNP and Reuse Assessment	USEPA/MDEQ	60	3.0	1, 2	2/24/2025	5/19/2025		- Agreed this is not critical for the RI phase. Submitted in March 2024. The USEPA/MDEQ will review and provide comments, as applicable.
7 Revisions to 12/4/23 RI/FS Work Plan	Hercules	80	4.0	2	2/24/2025	6/17/2025		- Based on feedback received to date through recent OU scoping calls and outcome of the 2023/2024 vapor intrusion investigation activities. Will also include comparison to revised screening levels per USEPA request.
8 Revisions to QAPP	Hercules	80	4.0	2	2/24/2025	6/17/2025		- Submitted in March 2024. Received comments from the USEPA on 11/5/24. Conference call has been scheduled for 12/17/24 to discuss comments and path forward for revisions. Approval required prior to RI implementation.
9 Revisions to DMP, FSP, and HASP	Hercules	40	2.0	4,5	4/22/2025	6/18/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
10 Revisions to ERNP and Reuse Assessment	Hercules	40	2.0	6	5/20/2025	7/18/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
11 Review and Comment on Revised RI/FS Work Plan	USEPA/MDEQ	80	4.0	7	6/18/2025	10/14/2025		- The USEPA/MDEQ will review and provide comments, if needed, prior to RI implementation.
12 Revisions to RI/FS Work Plan	Hercules	40	2.0	11	10/15/2025	12/12/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
13 Review and Approval of Revised RI/FS Work Plan, QAPP, DMP, FSP, and HASP	USEPA/MDEQ	40	2.0	8, 9, 12	12/15/2025	2/12/2026		- Approval critical for RI phase.
14 Review and Approval of ERNP and Reuse Assessment	USEPA/MDEQ	80	4.0	10	7/21/2025	11/13/2025		- Agreed approval of these documents is not critical for the RI phase. Review and approval can be completed after approval/implementation of the RI Work Plan.
RI Field Activities								
13 Implement Work Plan	Hercules	60	3.0	13+30d	3/30/2026	6/24/2026		- Assumes 60 working days to implement Phase I of the RI/FS. Goal is to implement RI/FS Work Plan in approximately 20 working days (30 calendar days) of USEPA/MDEQ approval of RI related documents.

Notes/Assumptions:

1. This schedule is considered a "living" document that will be updated accordingly throughout the performance of the specified tasks.

Acronyms and Abbreviations:

DMP - Data Management Plan

ERNP - Emergency Response and Notification Plan

FS - Feasibility Study

FSP - Field Sampling Plan

HASP - Health and Safety Plan

MDEQ - Mississippi Department of Environmental Quality

OU - Operable Unit

QAPP - Quality Assurance Project Plan

RI - Remedial Investigation

USEPA - United States Environmental Protection Agency