

**VIA ELECTRONIC MAIL**

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Date: March 19, 2025

Subject: **Monthly Progress Report (February 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. Egetter:

This *Monthly Progress Report* summarizes the activities accomplished between February 1 and February 28, 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 February 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 two conference calls with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) to support 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:
  - The first teleconference was held on February 4, 2025, to review the site history, regulatory history, data collected to date, and the conceptual site model (CSM). An email was submitted to the Agencies on February 5, 2025, providing a summary of the meeting, the slide deck used during the call, a list of reports submitted to the Agencies from 1980 through 2024 to facilitate reference to available documents, and a copy of the agreed upon working schedule to track progress throughout preparation of the Revised RI/FS Work Plan and Revised RI Deliverables.
  - The second teleconference was held on February 21, 2025, to review the data quality objectives (DQOs) and anticipated scope for the Revised RI/FS Work Plan. An email was submitted to the Agencies on February 26, 2025, providing a summary of action items and topics covered during the meeting, the slide deck used during the call, and the updated agreed upon working schedule to track progress throughout preparation of the Revised RI/FS Work Plan and Revised RI Deliverables. The updated version of the working schedule is included as **Attachment A**.
- Ms. Chrissy Piechoski (Hercules Project Manager/Project Coordinator) had a call with the Agencies on February 5, 2025, to discuss the financial assurance mechanisms, options to optimize the current groundwater and surface water monitoring requirements for the site, and preparation of a single Revised Field Sampling Plan (FSP) covering all the Operable Units (OUs) for the site (as opposed to 11 OU-specific documents, as referenced by the USEPA in correspondence dated January 23, 2025). It was agreed to work toward combining financial assurance into a single mechanism, reduce the frequency of current groundwater and surface water monitoring activities, and continue discussions regarding the FSP.
- Submitted the *Monthly Progress Report* for January 2025 to the Agencies on February 20, 2025.
- Submitted an email to the Agencies on February 27, 2025, describing the proposed adjustments to the current groundwater and surface water monitoring frequency for the site. The following actions will be performed in accordance with the ASAOC and discussions with the Agencies:
  - Once approved, the adjusted monitoring frequency will be used to maintain compliance with the RUAO and RCRA Orders until the Revised RI/FS Work Plan is approved by the Agencies.
  - The Revised RI/FS Work Plan will include the proposed scope for groundwater and surface water sampling to be performed during the RI phase of the project.
  - The results of the historical monitoring data will be combined with the results of the monitoring activities performed during the RI to develop the post-RI groundwater and surface water monitoring scope, which will be proposed in the RI Report.
- Continued 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 (March – May 2025)

- Finalize and submit the 2024 Second Semiannual Consolidated Monitoring Report to document the results of the sampling event conducted in November 2024.
- Preparation of the Revised RI/FS Work Plan and Revised RI Deliverables. Consistent with the discussions with the Agencies, the submittals will incorporate:
  - Updated CSM based on revised screening criteria per USEPA's request.
  - Transition from site-wide to OU approach (11 OUs).
  - OU-specific comments provided by the Agencies to date (OU-3 and OU-9).
  - Supplemental scope for the off-site vapor intrusion investigation within the southeast portion of the site based on the results of the 2023/2024 investigations.
  - Revisions to previously proposed scope (i.e., additions or subtractions) based on updates to the CSM and following OU-specific DQO processes.
- Provide a draft fact sheet to the USEPA to support sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area. Copies of previous draft fact sheets prepared and submitted to the USEPA following the prior stages of the vapor intrusion investigation, and an updated version summarizing the work performed to date, were provided via email on March 6, 2025.
- Continue discussions with the Agencies to consolidate the various financial assurance instruments required by the MDEQ under the RUAO and the USEPA under the RCRA Orders into a single instrument under the ASAO.
- Submit a letter requesting approval to abandon three former industrial supply wells (i.e., one damaged, two inactive) owned by Hercules and installed within the Catahoula Formation at the site.
- Continue discussions with the Agencies to develop a site-specific compound list for laboratory analyses to be documented in the Revised RI/FS Work Plan and Revised Quality Assurance Project Plan (QAPP) and used for RI phase of the project.

## Personnel and/or Project Changes

- Mr. Maher Budeir retired and is no longer the RCRA Remediation Project Manager (RPM) for the site. Mr. David Egetter will be the USEPA RCRA contact for the project.

## Community Involvement

- None this period.

## USEPA/MDEQ Support Needed

- Hercules received comments from the USEPA on the QAPP on November 5, 2024, and is awaiting comments or approval from the Agencies for 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 to incorporate the USEPA comments and 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.
<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.
<i>Sampling and Analysis Plan (SAP)</i>	3/29/2024	1/23/2025	The January 23, 2025 USEPA letter indicates that the SAP is no longer required, as the Revised RI/SF Work Plan, Revised FSP, and Revised QAPP will satisfy the substantive requirements of the document.

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- Hercules is awaiting comments or approval of the following documents submitted to the Agencies:
  - 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.
- Hercules is requesting written approval from the Agencies of the proposed adjustments to the current groundwater and surface water monitoring frequency for the site submitted via email on February 27, 2025.

The Hercules team appreciates your support with this project. If there are any questions concerning this submittal, please contact the Hercules Project Coordinator, Ms. Chrissy Piechoski at 302-647-9798, or me at 315-671-9224.

Sincerely,

Arcadis U.S., Inc.



Corey Averill  
Certified Project Manager

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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 (February 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	Complete	- 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 ASAO. 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