

**VIA ELECTRONIC MAIL**

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Date: April 18, 2025

Subject: **Monthly Progress Report (March 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: 30274506.3003

Dear Ms. Johnston and Mr. Egetter:

This *Monthly Progress Report* summarizes the activities accomplished between March 1 and March 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 March 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.

- Provided a draft fact sheet via email to the USEPA on March 6, 2025, to support sharing the results of the completed vapor intrusion investigation activities with the residents in the investigation area. The submittal included 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.
- Ms. Chrissy Piechoski (Hercules Project Manager/Project Coordinator) had calls with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on March 6 and March 31, 2025, to continue discussion regarding potential consolidation of the financial assurance mechanisms for the site.
- Provided updates via email to the Agencies on March 13 and March 31, 2025, on the work being done to compare the Appendix IX and CERCLA analytical lists for development of a proposed site-specific analyte list for the site. The site-specific list will be documented in the Revised RI/FS Work Plan and Revised Quality Assurance Project Plan (QAPP), and subsequently used for the RI phase of the project.
- Requested an update from the Agencies on March 19, 2025, regarding approval of the proposed adjustments to the current groundwater and surface water monitoring frequency for the site submitted on February 27, 2025. The USEPA responded to the request on April 16, 2025, indicating approval to transition the sampling frequency from semiannual to annual activities.
- Received a letter from the USEPA on March 19, 2025, with comments on 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. A conference call was scheduled for April 18, 2025, to discuss the comments and the path forward for future vapor intrusion investigation activities.
- Submitted the *Monthly Progress Report* for February 2025 to the Agencies on March 19, 2025.
- 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 ASOC, and requirements in the RUAO and RCRA Orders for the site.
- Continued preparation of the Revised RI/FS Work Plan and Revised RI Deliverables (i.e., QAPP, Field Sampling Plan [FSP], Data Management Plan [DMP], Health and Safety Plan [HASP], Reuse Assessment, and Emergency Response and Notification Plan; pending receipt of comments by the Agencies for deliverables still under their review). Consistent with the discussions with the Agencies, the submittals will incorporate:
  - Updated conceptual site model (CSM) based on revised screening criteria per USEPA's request.
  - Transition from site-wide to Operable Unit (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.

- The updated version of the working schedule developed to complete these tasks is provided in **Attachment A**.

## Challenges and/or Delays

- None this period.

## Tasks Planned for Next Three Months (April – June 2025)

- Participate in a conference call with the Agencies on April 18, 2025, to discuss the USEPA's comments received on March 19, 2025, and the path forward for future vapor intrusion investigation activities.
- Finalize and submit the 2024 Second Semiannual Consolidated Monitoring Report to document the results of the sampling event conducted in November 2024.
- 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. The request to abandon those wells has been included in previous Semiannual Consolidated Monitoring Reports since 2020, and during a conference call with the Agencies on February 21, 2025, the USEPA requested submittal of a separate letter summarizing the rationale previously discussed to support abandonment of the wells.
- 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 QAPP and used for RI phase of the project.
- Finalize and submit the Revised RI/FS Work Plan and Revised RI Deliverables, pending receipt of comments by the Agencies for deliverables still under their review.

## Personnel and/or Project Changes

- None this period.

## 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>DMP</i>                                      | 3/6/2024       | Requested by 4/21/25     | Essential for the RI phase. Approval required prior to RI implementation.  |
| <i>HASP</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.  |
| <i>FSP</i>                                      | 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. |

- 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.

Ms. Shelby Johnston and Mr. David Egetter  
April 18, 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)  
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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 (March 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