

VIA ELECTRONIC MAIL

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Date: May 20, 2025

Subject: **Monthly Progress Report (April 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 April 1 and April 30, 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 April 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.

- Received an email from the USEPA on April 15, 2025, notifying Hercules that letters were sent to the City of Hattiesburg and owners/tenants of the residential properties southeast of the site sharing the results of the vapor intrusion investigation activities completed in 2024 in the area:
 - On April 16, 2025, Hercules submitted an email to USEPA requesting: (1) copies of the letters submitted by the USEPA; and (2) that Gloria Tatum, as Hercules' designated Community Involvement Coordinator, be included on all future correspondence provided to the public so that she is better equipped to answer any related questions that she may receive from the community.
 - USEPA provided copies of one of the resident letters and the letter sent to the City of Hattiesburg via email that same day. The remaining letters were subsequently provided by the USEPA through the project SharePoint on April 18, 2025.
- Received approval from the USEPA on April 15, 2025, to adjust the routine groundwater and surface water monitoring frequency for the site. The USEPA concurred with transitioning from semiannual to annual monitoring events starting in November 2025 and continuing through November 2026.
 - In accordance with the agreement in the ASAOC, routine monitoring will continue until the Revised Remedial Investigation/Feasibility Study Work Plan (Revised RI/FS Work Plan) is approved by the Agencies.
 - Additional sampling activities will be proposed in the Revised RI/FS Work Plan, and the new data will be combined with historical results to refine the conceptual site model (CSM).
 - The Remedial Investigation Report will include a proposal for the future scope of the groundwater and surface water monitoring program for the site, which will be based upon the refined CSM and evaluation of potential risk at the site.
- Participated in a conference call with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) on April 18, 2025, to discuss the March 19, 2025 USEPA's comments on the *2023 & 2024 Vapor Intrusion Investigation Summary Report* submitted on November 22, 2024, and the potential next steps for the vapor intrusion investigation in the residential neighborhood. A summary of the call, action items, and the materials presented by Hercules during the conference call were provided via email on April 25, 2025.
- Submitted the *Monthly Progress Report* for March 2025 on April 18, 2025.
- Submitted the *2024 Second Semiannual Consolidated Monitoring Report* on April 18, 2025, documenting the results of the sampling event conducted in November 2024. The completed scope included 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.
- Continued preparation of a memo describing the methodology used to develop a proposed site-specific constituent list for the site. The site-specific constituent list will be incorporated into the Revised RI/FS Work Plan and Revised Quality Assurance Project Plan (QAPP) and subsequently used for the RI phase of the project.
- Continued preparation of a letter requesting approval to abandon three former industrial supply wells (i.e., one damaged, two inactive) installed within the Catahoula Formation at the site.

- Continued preparation of the Revised RI/FS Work Plan and Revised QAPP. Revisions to the remaining RI Deliverables (i.e., Field Sampling Plan [FSP], Data Management Plan [DMP], Health and Safety Plan [HASP], Reuse Assessment, and Emergency Response and Notification Plan) will be performed at a schedule to be determined following receipt of comments by the Agencies. Consistent with the discussions with the Agencies, the Revised RI/FS Work Plan and Revised QAPP will incorporate the following (as appropriate):
 - Updated 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 vapor intrusion investigation scope for the residential neighborhood adjacent to 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 working schedule developed to complete these tasks is provided in **Attachment A**. This conceptual schedule was discussed and agreed to by the USEPA on January 14, 2025, and has been updated to reflect completion of some of the tasks since then.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (May – July 2025)

- Submit the 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 letter was submitted on May 12, 2025.
- Submit the memo describing the methodology used to develop a proposed site-specific compound list for laboratory analyses to be incorporated in the Revised RI/FS Work Plan and Revised QAPP, and subsequently used for the RI phase of the project. The memo was submitted on May 12, 2025. A conference call will be coordinated with the Agencies, as needed, to discuss the proposed site-specific compound list following review of this submittal.
- Finalize and submit the Revised RI/FS Work Plan and Revised QAPP. As noted above, the schedule for submitting the remaining RI Deliverables will be determined upon receipt of comments by the Agencies on those documents.

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:

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- 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 *2024 Second Semiannual Consolidated Monitoring Report* submitted on April 18, 2025. The document summarized the results of the May 2024 sampling event.

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

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 (April 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 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