

VIA ELECTRONIC MAIL

Ms. Shelby Johnston
RCS Chief
Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

Arcadis U.S., Inc.
4300 W Cypress Street
Suite 450
Tampa
Florida 33607
Phone: 813 903 3100
Fax: 813 350 9046
www.arcadis.com

Mr. David Egetter
Manager, Corrective Action Section
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Mail Code: 9T25
Atlanta, Georgia 30303-8960

Date: June 20, 2025

Subject: **Monthly Progress Report (May 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 completed between May 1 and May 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 May 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.

- Submitted a memo titled *Development of Site-Specific Constituent List for Remedial Investigation* on May 12, 2025. The document describes the methodology used to develop a proposed site-specific compound list for laboratory analyses to be incorporated in the Revised Remedial Investigation/Feasibility Study Work Plan (Revised RI/FS Work Plan) and Revised Quality Assurance Project Plan (Revised QAPP), and subsequently used for analysis of samples collected during the RI phase of the project.
- Submitted a letter titled *Request to Abandon Inactive Industrial Supply Wells* on May 12, 2025. The letter outlines the rationale for 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.
- Submitted the *Monthly Progress Report* for April 2025 on May 20, 2025.
- Continued preparation of the Revised RI/FS Work Plan and Revised QAPP. Consistent with the discussions with the USEPA and the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies), the Revised RI/FS Work Plan and Revised QAPP will incorporate the following (as appropriate):
 - 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 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 an OU-specific data quality objective (DQO) process.

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 (June – August 2025)

- Finalize and submit the Revised RI/FS Work Plan and Revised QAPP.
- Initiate revisions to the *Data Management Plan*, *Health and Safety Plan*, and *Emergency Response and Notification Plan* after reviewing comments received from the USEPA on June 6, 2025. The USEPA had no comments on the *Reuse Assessment*; therefore, no revisions are necessary for that document.
- Revisions to the *Field Sampling Plan* will be performed at a schedule to be determined following receipt of comments on that document from the Agencies.

Personnel and/or Project Changes

- None this period.

Ms. Shelby Johnston and Mr. David Egetter
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Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Hercules is awaiting comments or approval of the following documents submitted to the Agencies:
 - The *Field Sampling Plan* submitted on March 29, 2024.
 - 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 November 2024 sampling event.
 - The *Development of Site-Specific Constituent List for Remedial Investigation* memo submitted on May 12, 2025.
 - The *Request to Abandon Inactive Industrial Supply Wells* letter submitted on May 12, 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

Email: Corey.Averill@arcadis.com
Direct Line: 315-671-9224

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 (May 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. The agency provided a letter on 1/23/2025 modifying the requirement in the ASAOC for this RI Deliverable.
4	Review and Comment on DMP and HASP	USEPA/MDEQ	--	--	1, 2	2/24/2025	6/6/2025	Complete	- Both documents critical for the RI phase. Submitted in March 2024. The USEPA provided comments in a letter dated June 6, 2025.
5	Review and Comment on ERNP and Approval of Reuse Assessment	USEPA/MDEQ	--	--	1, 2	2/24/2025	6/6/2025	Complete	- Agreed this is not critical for the RI phase. Submitted in March 2024. The USEPA provided comments in a letter dated June 6, 2025. No revisions to the Reuse Assessment are necessary.
6	Review and Comment on FSP	USEPA/MDEQ	40	2.0	1, 2	2/24/2025	4/21/2025		- This document is critical for the RI phase. Submitted in March 2024. Approval required prior to RI implementation.
7	Revisions to 12/4/23 RI/FS Work Plan	Hercules	88	4.4	2	2/24/2025	6/30/2025		- 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 was held on 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	6/9/2025	8/6/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
10	Revisions to ERNP	Hercules	40	2.0	6	6/9/2025	8/6/2025		- 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	7/1/2025	10/24/2025		- 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	10/27/2025	12/24/2025		- 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	12/26/2025	2/25/2026		- Approval critical for RI phase.
14	Review and Approval of Revised ERNP	USEPA/MDEQ	80	4.0	10	8/7/2025	12/3/2025		- 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									
15	Implement Revised RI/FS Work Plan	Hercules	60	3.0	13+30d	4/9/2026	7/6/2026		- 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