

VIA ELECTRONIC MAIL

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Date: July 17, 2025

Subject: **Monthly Progress Report (June 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 June 1 and June 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 June 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 the Mississippi Department of Environmental Quality (MDEQ) (together, the Agencies) and Hercules over that same period.

- Received a letter from the USEPA on June 6, 2025, providing comments on the *Data Management Plan*, *Health and Safety Plan*, and *Emergency Response and Notification Plan* submitted by Hercules on March 6, 2024, and the *Reuse Assessment* submitted by Hercules on March 29, 2024. That letter indicates that the USEPA had no comments on the *Reuse Assessment*; therefore, no revisions are necessary for that document.
- Submitted an email to the USEPA on June 13, 2025, requesting an extension for submittal of the *Revised Remedial Investigation/Feasibility Study Work Plan* (Revised RI/FS Work Plan) and *Revised Quality Assurance Project Plan* (Revised QAPP) until June 30, 2025. The conceptual schedule agreed to by the Agencies and Hercules had submittal of those documents by June 17, 2025, but additional time was needed to finalize the Operable Unit-specific portions of the deliverables. The USEPA approved the extension request on June 16, 2025, and the *Revised RI/FS Work Plan* and *Revised QAPP* were subsequently submitted to the Agencies on June 30, 2025.
- Submitted the *Monthly Progress Report* for May 2025 on June 20, 2025.
- Received a letter from the USEPA on June 23, 2025, providing comments on the *Field Sampling Plan* submitted by Hercules on March 29, 2024.

Challenges and/or Delays

- None this period.

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

- Complete revisions and submit the *Revised Data Management Plan*, *Revised Health and Safety Plan*, *Revised Emergency Response and Notification Plan*, and *Revised Field Sampling Plan* incorporating the comments received from the USEPA on June 6 and June 23, 2025.
- The working schedule developed to complete these tasks is provided in **Attachment A**. The conceptual schedule, which was discussed and agreed to by the USEPA on January 14, 2025, has been updated accordingly to reflect current status, including completion of certain tasks.

Personnel and/or Project Changes

- None this period.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- 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.

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- 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.



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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 (June 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	---	---	---	1/14/25	1/14/25	Complete	
1	Overview of Site and Conceptual Site Model (CSM)	Hercules	---	---	---	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	---	---	---	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	---	---	1, 2	2/24/2025	6/23/2025	Complete	- This document is critical for the RI phase. Submitted in March 2024. The USEPA provided comments in a letter dated June 23, 2025.
7	Revisions to 12/4/23 RI/FS Work Plan (i.e., Revised RI/FS Work Plan)	Hercules	88	4.4	2	2/24/2025	6/30/2025	Complete	- Submitted on June 30, 2025, based on feedback received to date through recent OU scoping calls, outcome of the 2023/2024 vapor intrusion investigation activities, and comparison to revised screening levels per USEPA request.
8	Revisions to QAPP	Hercules	88	4.4	2	2/24/2025	6/30/2025	Complete	- Original QAPP 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. Revised QAPP submitted on June 30, 2025.
9	Revisions to HASP and ERNP	Hercules	50	2.5	4,5	6/9/2025	8/20/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
10	Revisions to DMP and FSP	Hercules	60	3.0	6	6/24/2025	9/18/2025		- Revisions to be completed based on feedback from the USEPA/MDEQ.
11	Review of 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	Finalize Revised 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	9/19/2025	1/16/2026		- 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