

**VIA ELECTRONIC MAIL**

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Date: August 19, 2025

Subject: **Monthly Progress Report (July 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 July 1 and July 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 July 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.

- Gloria Tatum, Hercules Community Involvement Coordinator, participated in a conference call with the Agencies on July 14, 2025, to discuss the Technical Assistance Needs Assessment (TANA) meeting tentatively scheduled for the week of September 15, 2025.
- Submitted an email to the Agencies on July 15, 2025, with an update on the submittal of the supporting RI Deliverables for the site incorporating the comments received from the USEPA on June 6 and June 23, 2025: *Revised Health and Safety Plan* and *Revised Emergency Response and Notification Plan* to be submitted by August 20, 2025, and *Revised Data Management Plan* and *Revised Field Sampling Plan* to be submitted by September 18, 2025. The USEPA provided concurrence on the updated schedule on July 16, 2025.
- Submitted the *Monthly Progress Report* for June 2025 on July 17, 2025.
- Received a letter from the USEPA on July 22, 2025, providing comments on the *Development of Site-Specific Constituent List for Remedial Investigation* submitted by Hercules on May 12, 2025.

## Challenges and/or Delays

- None this period.

## Tasks Planned for Next Three Months (August – October 2025)

- Complete updates 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 discussed and agreed to by the USEPA on January 14, 2025, has been updated accordingly to reflect current status, including completion of certain tasks and updates provided to and from the Agencies.
- Address the comments provided by the USEPA on the *Development of Site-Specific Constituent List for Remedial Investigation*.
- Attend the TANA meeting tentatively scheduled for the week of September 15, 2025.

## 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 *Request to Abandon Inactive Industrial Supply Wells* letter submitted on May 12, 2025.
- The *Revised Remedial Investigations/Feasibility Study Work Plan* submitted on June 30, 2025.
- The *Revised Quality Assurance Project Plan* submitted on June 30, 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**



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