

VIA ELECTRONIC MAIL

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Date: October 20, 2025

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

- Attended the Technical Assistance Needs Assessment (TANA) meeting hosted by the USEPA on September 16, 2025.
- Participated in a meeting with the Agencies and provided a tour of the site on September 17, 2025. The USEPA confirmed the goal of working towards initiating RI activities in the Spring 2026, per the conceptual schedule previously discussed and agreed to by the USEPA (**Attachment A**).
- Submitted the *Revised Data Management Plan* and *Revised Field Sampling Plan* to the Agencies on September 18, 2025. Those submittals included Response to Comment Letters addressing the USEPA's June 6, 2025 comments on the *Data Management Plan* submitted on March 6, 2024, and the USEPA's June 23, 2025 comments on the *Field Sampling Plan* submitted on March 29, 2024.
- Submitted the *Monthly Progress Report* for August 2025 to the Agencies on September 19, 2025.
- Submitted a revised version of the *Development of Site-Specific Constituent List for Remedial Investigation* to the Agencies on September 19, 2025. That submittal included revised tables and language that were discussed during the September 17, 2025 site visit, to provide clarifications and facilitate resolution of the USEPA's July 22, 2025 comments on the original document submitted on May 12, 2025.
- Received two letters from the USEPA on September 24, 2025:
 - The first letter provided comments on the *2023 Second Semiannual Consolidated Monitoring Report* submitted on June 7, 2024, the *2024 First Semiannual Consolidated Monitoring Report* submitted on November 15, 2024, and the *2024 Second Semiannual Consolidated Monitoring Report* submitted on April 18, 2025.
 - The second letter provided approval to abandon the three inactive industrial supply wells screened within the Catahoula formation at the site, in accordance with the *Request to Abandon Inactive Industrial Supply Wells* letter submitted on May 12, 2025.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (October – December 2025)

- Participate in conference calls with the Agencies to facilitate discussion on the status of the Agencies' review of the *Revised Remedial Investigations/Feasibility Study Work Plan* and the *Revised Quality Assurance Project Plan*, which were submitted on June 30, 2025.
- The working schedule developed to complete the review and approval of the documents required to initiate implementation of the RI is provided in **Attachment A**. The conceptual schedule, discussed and agreed to by the USEPA on January 14, 2025, has been updated to reflect current status, as well as completion of certain tasks and updates provided to and from the Agencies.
- Coordination and implementation of the 2025 annual monitoring event, as approved by the USEPA on April 15, 2025, and in accordance with the agreement in the ASAO and the requirements in the Restrictive Use Agreed Order (RUAO) and the RCRA Orders for the site. The monitoring event is scheduled for November 2025.

Ms. Shelby Johnston and Mr. David Egetter
October 20, 2025

Personnel and/or Project Changes

- Mr. Kevin Koporec, USEPA human health risk assessor, retired. Ms. Ayana Cunningham joined the project team as the USEPA human health risk assessor.

Community Involvement

- The USEPA hosted the TANA meeting on September 16, 2025, at the C.E. Roy Community Center in Hattiesburg, Mississippi. The meeting was open to the public with an afternoon session from 2:00 to 4:00 pm, followed by an evening session from 5:00 to 7:00 pm.

USEPA/MDEQ Support Needed

- Hercules is awaiting approval or comments (if any) of the following documents submitted to the Agencies:
 - 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.



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CC. Cassandra Johnson – MDEQ, Jackson, MS (electronic)
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Chrissy Piechoski – Hercules, Wilmington, DE (electronic)
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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	Complete	- Revisions completed based on feedback from the USEPA and MDEQ.
10	Revisions to DMP and FSP	Hercules	60	3.0	6	6/24/2025	9/18/2025	Complete	- Revisions completed based on feedback from the USEPA and 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 and MDEQ.
13	Review and Approval of Revised RI/FS Work Plan, QAPP, and FSP	USEPA/MDEQ	40	2.0	8, 10, 12	12/26/2025	2/25/2026		- Approval critical for RI phase.
14	Review and Approval of Revised ERNP, DMP, and HASP	USEPA/MDEQ	80	4.0	9, 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 of the Revised RI/FS 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 start implementing the 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