

VIA ELECTRONIC MAIL

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Date: November 20, 2025

Subject: **Monthly Progress Report (October 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 October 1 and October 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.”

The information contained herein 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.

Attachment A includes the updated conceptual schedule to implement the RI. The schedule was originally discussed and agreed to by the USEPA on January 14, 2025, and is updated as work progresses. The current schedule shows RI implementation moving from Spring 2026 to Fall 2026, which is due to the USEPA stating that

additional rounds of comments will be provided on select RI Deliverables, and to add Response to Comment letters (per discussions with the USEPA in October 2025, as noted below).

Tasks Initiated, Continued, or Completed during October 2025

- Participated in conference calls with the Agencies on October 6 and October 17, 2025, to discuss preliminary comments from the Agencies' review of the *Revised Remedial Investigation/Feasibility Study Work Plan (Revised RI/FS Work Plan)* submitted on June 30, 2025.
- Ms. Chrissy Piechoski (Hercules Project Coordinator) had a call with USEPA representatives on October 16, 2025, to discuss the path and potential timeline to finalize the RI Deliverables for the site, with the continued shared goal of initiating the RI field work in Spring 2026. The following items were discussed during the call:
 - Hercules submitted the seven RI Deliverables required by the ASAOC in March 2024 (i.e., *Emergency Response and Notification Plan (ERNP)*, *Data Management Plan (DMP)*, *Health and Safety Plan (HASP)*, *Quality Assurance Project Plan (QAPP)*, *Field Sampling Plan (FSP)*, *Sampling and Analysis Plan (SAP)*, and *Reuse Assessment*).
 - The USEPA has provided at least one round of comments, modification to the requirements in the ASAOC (i.e., *SAP* is no longer required), or approval (i.e., *Reuse Assessment*) for those submittals.
 - Hercules submitted revised versions of the applicable RI Deliverables addressing USEPA comments received to date and in accordance with discussions and agreements reached during multiple conference calls with the Agencies.
 - The USEPA indicated that additional comments will be provided for select RI Deliverables. In an effort to streamline Agency review, it was agreed that Response to Comments letters will be prepared to address those new comments and obtain concurrence on path forward before completing revisions and finalizing the applicable RI Deliverables.
 - Since USEPA stated that they will provide additional rounds of comments on select RI Deliverables and to incorporate Response to Comment letters into the process, the conceptual schedule to implement the RI activities was adjusted (**Attachment A**). It pushes the start of the field work from Spring 2026 to Fall 2026, and the USEPA indicated that they will look at ways to streamline the process to see if RI implementation can start sooner.
- Submitted the *Monthly Progress Report* for September 2025 to the Agencies on October 20, 2025.
- As requested by the USEPA, the *Contractor Contact Information and Quality Management Plans* was resubmitted on October 23, 2025. The information was originally provided to the USEPA on December 16, 2022, pursuant to Section VII, Paragraph 30 (Designation of Contractors and Project Coordinators) in the ASAOC.
- Received a letter from the USEPA on October 28, 2025, providing comments on the Revised RI/FS Work Plan.
- Notified the Agencies of the anticipated start for the 2025 annual monitoring event on October 29, 2025. The event, which was completed between November 3 and November 14, 2025, was performed in accordance with the agreement in the ASAOC, the requirements in the Restrictive Use Agreed Order (RUAO) and the RCRA Orders for the site, and the scope approved by the USEPA on April 15, 2025.

Challenges and/or Delays

- None this period.

Tasks Planned for Next Three Months (November 2025 – January 2026)

- Complete the 2025 annual monitoring event and develop the associated report.
- Participate in conference calls with the Agencies to discuss the USEPA's October 28, 2025 comments on the *Revised RI/FS Work Plan* and Hercules' proposed responses:
 - A conference call was held on November 17, 2025, to discuss the Hercules proposed responses to the USEPA comments.
 - Submit a Response to Comment letter to the Agencies.
 - Supplemental conference calls can be coordinated, as needed, to facilitate review and approval of those responses.
 - Submit a Revised RI/FS Work Plan to the Agencies upon receipt of approval of the Response to Comment letter.
- Decommission the three inactive industrial supply wells screened within the Catahoula formation at the site, as approved by the USEPA on September 24, 2025.

Personnel and/or Project Changes

- None this period.

Community Involvement

- None this period.

USEPA/MDEQ Support Needed

- Hercules is awaiting Agency review and/or approval of the following documents submitted to the Agencies:
 - The *Revised Quality Assurance Project Plan* (Revised QAPP) submitted on June 30, 2025.
 - The *Revised Emergency Response and Notification Plan* submitted on August 20, 2025.
 - The *Revised Data Management Plan* submitted on September 18, 2025.
 - The *Revised Field Sampling Plan* submitted on September 18, 2025.

The Hercules team appreciates USEPA's continued 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.

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

Sincerely,

Arcadis U.S., Inc.



Corey Averill
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)
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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 (October 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	Conceptual schedule uses completion of this task as the starting date for future tasks.
1	Overview of Site and Conceptual Site Model (CSM)	Hercules	---	---	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+12d	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	Agency Review of 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	Agency Review of 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	Agency Review of 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	Submit 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	Submit Revised 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	Submit Revised 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	Submit Revised 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	Agency Review of Revised RI/FS Work Plan	USEPA/MDEQ	82	4.1	7	7/1/2025	10/28/2025	Complete	The USEPA provided comments in a letter dated October 28, 2025. A conference call was held on November 17, 2025 to discuss the comments and proposed Hercules responses.
12	Submit RTCs on Revised RI/FS Work Plan	Hercules	35	1.8	11	10/29/2025	12/19/2025		
13	Agency Review of RTCs on Revised RI/FS Work Plan	USEPA/MDEQ	40	2.0	12	12/22/2025	2/20/2026		
14	Agency Review of Revised QAPP	USEPA/MDEQ	95	4.8	8	7/1/2025	11/17/2025		
15	Submit RTCs on Revised QAPP	Hercules	40	2.0	14	11/18/2025	1/16/2026		
16	Agency Review of RTCs on Revised QAPP	USEPA/MDEQ	40	2.0	14	1/20/2026	3/18/2026		
17	Agency Review of Revised FSP	USEPA/MDEQ	80	4.0	10	9/19/2025	1/16/2026		
18	Submit RTCs on Revised FSP	Hercules	30	1.5	17	1/20/2026	3/4/2026		
19	Agency Review of RTCs Revised FSP	USEPA/MDEQ	40	2.0	18	3/5/2026	4/30/2026		

Footnotes on Page 2.



Task		Responsible Party	Duration (Working Days)	Duration (Months)	Predecessor Task	Start	Finish	Status	Key Assumptions/Comments
20	Submit Final RI/FS Work Plan, QAPP, and FSP	Hercules	40	2.0	13, 16, 19	5/1/2026	6/30/2026		
21	Agency Review and Approval of Final RI/FS Work Plan, QAPP, and FSP	USEPA/MDEQ	60	3.0	20	7/1/2026	9/25/2026		- Approval critical to initiate RI.
22	Agency Review and Approval of Revised ERNP, DMP, and HASP	USEPA/MDEQ	80	4.0	9, 10	9/28/2026	1/21/2027		- 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. Agency will not approve HASP per ASAOC.
RI Field Activities									
23	Implement Final RI/FS Work Plan	Hercules	60	3.0	22+30d	11/10/2026	2/4/2027		- Goal is to implement RI/FS Work Plan in approximately 20 working days (30 calendar days) of USEPA/MDEQ approval of RI related documents. Assumes 60 working days to implement the RI field activities.

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