

VIA ELECTRONIC MAIL

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Date: December 17, 2025

Subject: **Monthly Progress Report (November 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 November 1 and November 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 (ASAOC) 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.

Tasks Initiated, Continued, or Completed during November 2025

- Completed the 2025 annual monitoring event between November 3 and November 14, 2025. The monitoring activities were 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.
- Participated in a conference call with the Agencies on November 17, 2025, to discuss USEPA's comments regarding the *Revised Remedial Investigation/Feasibility Study Work Plan* (Revised RI/FS Work Plan). The USEPA provided those comments on October 28, 2025.
- Submitted the *Monthly Progress Report* for September 2025 to the Agencies on November 20, 2025.

Conceptual Schedule

- **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 being updated by Hercules as work progresses and in accordance with communications, agreements, and requests by the Agencies.
- The current schedule shows a shift in RI implementation from Spring 2026 to Fall 2026, primarily due to the ongoing document review process. The USEPA is collaborating with Hercules to expedite the review process and meet RI objectives.

Tasks Planned for Next Three Months (December 2025 – February 2026)

- Provide a summary of the key takeaways and agreements, and links to the materials used during the November 17, 2025 conference call (i.e., figures, PowerPoint presentation with Bouie River Preliminary Conceptual Site Model, and documents previously submitted under the RCRA program). The summary was provided on December 3, 2025 and the USEPA provided an email concurring with the summary on December 4, 2025.
- Continue the process to finalize the *Revised RI/FS Work Plan* in accordance with discussions with the USEPA (**Attachment A**):
 - Submit a Response to Comment letter to the Agencies addressing the October 28, 2025 USEPA comments per discussions during the November 17, 2025 call.
 - Supplemental conference calls can be coordinated, as needed, to facilitate review and approval of those responses.
 - Submit an update to the *Revised RI/FS Work Plan* to the Agencies upon receipt of approval of the Response to Comment letter.
- Preparation and submittal of the *2025 Annual Consolidated Monitoring Report* documenting the activities and results of the 2025 annual monitoring event.
- 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

- Due to the limited level of activity expected prior to the start of the RI activities, Hercules requests that Progress Reports be submitted on a quarterly rather than monthly basis. The need for more frequent progress updates can be reconsidered once the RI Deliverables are approved and the RI field work phase is underway.

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.

Sincerely,

Arcadis U.S., Inc.



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Project Manager

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Attachment A

RI/FS Working Schedule

Attachment A
Working Schedule - Remedial Investigation/Feasibility Study Approach
Monthly Progress Report (November 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 | | |

Attachment A
Working Schedule - Remedial Investigation/Feasibility Study Approach
Monthly Progress Report (November 2025)
Hercules Inc. Superfund Site
Hattiesburg, Mississippi



| 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

USEPA - United States Environmental Protection Agency

RI - Remedial Investigation