



DHEC Response to Comments

October 2, 2012

Seaco, Inc. Site – Commerce and William Tuller Drive – Columbia, South Carolina

Owner: AA Properties-Commerce Tuller, LLC / **Operator:** Associated Asphalt Columbia, LLC
Voluntary Cleanup Contract 12-6100-NRP

Former Bagnal Builders Site – South Edisto Avenue – Columbia, South Carolina

Owner: AA Properties-Edisto, LLC / **Operator:** Associated Asphalt Columbia, LLC
Voluntary Cleanup Contract 12-6101-NRP

This document summarizes comments received by the South Carolina Department of Health and Environmental Control (DHEC) during the public comment period for the above Voluntary Cleanup Contracts (VCCs). DHEC's responses to these comments are included. The public comment period began on June 10, 2012 and remained open through September 11, 2012.

After careful consideration of all comments received, DHEC has decided to enter into the VCCs as proposed for the Seaco, Inc. Site and the Former Bagnal Builders Site. This document and the final VCCs may be viewed on DHEC's website at www.scdhec.gov/SEACO.

Written comments and concerns submitted during the public comment period have been summarized into five categories, as follows:

1. Request for a public meeting and extension of the public comment period, and a Freedom of Information (FOI) request for documents.

DHEC held a public meeting at 6:00 p.m. on August 28, 2012 at A.C. Moore Elementary School, located in the Rosewood Community. The meeting enabled DHEC staff to talk with citizens about the Brownfields/Voluntary Cleanup Program (VCP) and the benefits of additional environmental assessments that would be required of each site under a VCC. (An initial environmental assessment, as required by the VCP, previously revealed the presence of elevated levels of arsenic and lead in soil at the Seaco, Inc. site.) The meeting also gave citizens the opportunity to voice concerns, provide written comments and ask questions about the proposed VCCs. Mr. Sam Cannon, owner of Associated Asphalt Columbia, LLC (Associated Asphalt), also attended the meeting to discuss and answer questions about continued operations at both of the sites.

DHEC extended the public comment period until September 11, 2012 so that written comments could be submitted after the meeting.

Documents pertaining to both sites were made available by DHEC's FOI office in response to a specific request made on behalf of the Rosewood Community Council. In an effort to make information more readily accessible to the community, DHEC also created a website at www.scdhec.gov/Seaco. This website provides a history of both sites and includes supporting documents from DHEC's Bureau of Land and Waste Management and Bureau of Air Quality.

2. Continued operation of the Seaco, Inc. asphalt emulsion plant.

The Seaco, Inc. site is zoned M-1 for light-industrial use. DHEC acknowledges the community's concerns regarding air quality, specifically fumes and smells from the asphalt emulsion plant. DHEC will continue to investigate odor complaints, as well as ensure that operations of the asphalt emulsion plant and the adjacent Colprovia Asphalts (a division of Seaco, Inc.), are in accordance with state regulations and permit requirements. Additionally, Mr. Sam Cannon stated during the public meeting that air quality concerns were being addressed at the asphalt emulsion plant by the installation of filters to prevent fumes and/or smells.

It is important to remember that a VCC does not address or affect a site owner and/or operator's existing permit(s) to operate. The VCC requires the site owner/operator to perform additional environmental assessments of the site. If significant contamination is found, the owner/operator is required to take additional steps to protect human health and the environment and keep the property safe for re-use. The VCC also requires the owner/operator to ensure the safety of their workers and the surrounding community from environmental risks found on-site.

3. Expansion of the asphalt emulsion plant.

Mr. Sam Cannon explained during the meeting that the base products used at the asphalt emulsion plant are currently delivered by truck from Georgia and North Carolina. He further stated that Associated Asphalt's goal is to use a rail siding at the Former Bagnal Builders site to bring these products in by rail car, thus eliminating that portion of truck traffic to and from the asphalt emulsion plant using state-owned roads.

4. Existing contamination on the Seaco, Inc. site.

DHEC shares the community's concerns regarding the discovery of existing contamination, namely arsenic and lead, in soil at the Seaco, Inc. site. Because neither arsenic nor lead is associated with asphalt or asphalt emulsion production, DHEC researched the historical use of the Seaco, Inc. site for other possible explanations. Through this process, DHEC learned that a fertilizer manufacturer (F.S. Royster Guano Company) operated at the Seaco, Inc. site and adjacent properties beginning in 1902, until approximately the 1930s. This discovery led DHEC to collect surface soil samples around the Seaco, Inc. site. Through this sampling, DHEC was able to determine that the contamination did not extend beyond the Edisto Court Community. DHEC provided free urine testing for arsenic and blood testing for lead to all residents living in the Edisto Court Community, as well as employees of Seaco, Inc. and other nearby businesses. The United States Environmental Protection Agency (EPA) was contacted by DHEC and responded with additional soil testing to confirm DHEC's findings. The EPA is currently developing a plan to clean-up the properties in the Edisto Court Community where the highest levels of arsenic and lead were found.

The general results of DHEC's and EPA's investigations were shared during the public meeting. All of these events occurred during the public comment period for the VCC contracts and updates were made available throughout the investigations on DHEC's website.

A major benefit of the VCCs is that more thorough environmental investigations will be conducted on each site. The VCCs require the assessment of surface and subsurface soil, groundwater and, when necessary, a study of indoor air quality at the sites.

The results of these investigations will enable DHEC to focus on areas that pose potential risks to on-site workers and the surrounding community, and to ensure that the sites are made safe for re-use.

5. The continued release of volatile organic compounds (VOCs) from the asphalt emulsion plant.

There is no evidence that VOCs are released during asphalt emulsion plant operations. Solvents used during the cleaning of machine parts typically generate VOCs. The presence of VOCs in groundwater in the vicinity of the Seaco, Inc. maintenance building, as documented in the Phase II Environmental Site Assessment Report, may be attributed to a historical release at the maintenance shop. Tetrachloroethene (PCE) and trichloroethene (TCE) are VOCs that were detected in two of eight groundwater sample points tested on the Seaco, Inc. site. One sample point detected a 7.9 parts per billion (ppb) concentration of PCE, which is above the applicable drinking water standard of 5.0 ppb. The other detections were at concentrations below applicable drinking water standards.

One benefit of the additional environmental assessment that will be conducted at the Seaco, Inc. site is the verification of contamination and the potential discovery of other areas of concern. The VCC will require soil and groundwater samples to be collected in the vicinity of the maintenance shop to determine the depth and extent of any historical release. The results of these samples will help DHEC to determine what more needs to be done about the contamination. Entering into a VCC does not reduce the responsibility of any former owners or operators of the site. DHEC continues to work with the past owner to address cleanup of the Seaco, Inc. site.

DHEC appreciates the comments and concerns expressed during the public comment period and remains committed to keeping the Edisto Court and Rosewood Communities updated about ongoing investigations and any environmental remediation at the Seaco, Inc. and Former Bagnal Builders sites. This will be done primarily through the DHEC website at www.scdhec.gov/SEACO.