May 2, 2019

SCANNED



Ms. Jan Trent Project Manager State Voluntary Cleanup Program Site Assessment, Remediation & Revitalization Division Bureau of Land and Waste Management South Carolina Department of Health and Environmental Control 2600 Bull Street Columbia, South Carolina 29201

MAY 0 6 2019

SITE ASSESSMENT, REMEDIATION & REVITALIZATION

Re: Response to DHEC Comments dated March 29, 2019

Source Area Focused Feasibility Study dated February 14, 2019

Honea Path, South Carolina BLWM Site ID: 400238 **AEM Project No. 1320-1802** 

Dear Ms. Trent:

The South Carolina Department of Health and Environmental Control (DHEC) provided comments for the Source Area Focused Feasibility Report in correspondence letter dated March 29, 2019. The comments are addressed in order as follows.

DHEC Comment No. 1—Table 1. The Source Area Soil Remedial Options Evaluation ranks several remedial technologies against the seven CERCLA criteria; however, only two options were carried through to the comparative analysis in Section 4 of the document. The Department requests that excavation and in-situ chemical oxidation-soil blending, and/or electrical resistive heating be included in the comparative analysis in addition to the two already included in Section 4. The table may also need to be adjusted to reflect different scores for the in-situ chemical oxidation soil blending, and/or electrical resistive heating.

AEM Response—As requested, Ingersoll Rand will revise the Feasibility Study and present a comparative analysis for excavation and in situ chemical oxidation-soil blending in Section 4.

DHEC Comment No. 2—Table 2. The Source Area Groundwater Remedial Options Evaluation ranks several remedial technologies against the CERCLA criteria; however, only two were carried through to the comparative analysis in Section 4. Please include pump and treat (continue containment) and vacuumed enhanced extraction in addition to the two options that were previously included in the comparative analysis.

AEM Response—Pump and Treat (Continued Containment) was carried through to Section 4 in Section 4.3.1 as No Action/Continued Containment. We will update the table and text to use No Additional Action/Continued Containment in both locations.



Ms. Jan Trent—DHEC May 2, 2019 Page 2

Also, as requested, Ingersoll Rand will revise the Feasibility Study and carry vacuum enhanced extraction through to Section 4, thus providing a text discussion in Section 4 of the comparative analysis for vacuum enhanced extraction.

**DHEC Comment No. 3**—The document should also include Figures depicting the locations for each technology included in the comparative analysis.

**AEM Response**—Figures will be included in the revised Feasibility Study depicting the locations of each technology included in the comparative analysis.

Upon DHEC's approval to this response to comments, a revised Source Area Focused Feasibility Report will be provided to you addressing the DHEC comments as presented above within 45 days.

If you have any questions, please call us at (404) 329-9006.

Sincerely,

Atlanta Environmental Management, Inc.

Leona Miles, CHMM

Project Manager

Michael Brock, P.G. Vice President

/krf

c: Michael Goldstein (Ingersoll Rand)

**Enclosures** 

