

Burris Environmental Services**SCANNED**

August 21, 2019

Via Email

Tim Hornosky, P.G.
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RECEIVED

AUG 23 2019

 DEPARTMENT,
 DIVISION &
 REGISTRATION
RE: Response to DHEC letter 24 July 2019

Dear Mr. Hornosky,

Thank you for participating in the meeting in Charleston. I believe it was helpful to have all interested parties in the meeting to review the site history and conditions. In follow up to that meeting, I would like to clarify a few points, and provide responses to the items in your letter.

With regard to the source of volatile organic compounds (VOCs) in groundwater and soil, based on extensive soil and groundwater testing performed by Soco Chemical (now Brenntag) and Burris Environmental Services (BES), the source of volatile organic compounds (VOCs) in the groundwater and soil on both properties clearly originates in the area near MW-14, which is located on the Brenntag property. Brenntag's predecessor in interest, Soco Chemical, acquired Burris Chemical by merger in December 1996. By virtue of that merger, Soco acquired the Charleston property containing the warehouse and chemical operations, including the property where MW-14 is located.

The office building (Headquarters) was separated and conveyed immediately prior to the merger to the newly formed entity Burris Environmental Services (BES). While this new entity has the name "Burris", the business assets and liabilities of Burris Chemical were not passed to BES, but were instead acquired and assumed by Soco Chemical, which later became Brenntag. As part of that merger, Soco assumed responsibility for environmental remediation of the Charleston property, including taking assignment of an existing contract for remediation of the groundwater at this site, which remediation was described in a Corrective Action Plan dated June 18, 1993. The plan contemplated in that assigned contract was approved by DHEC and implemented by Soco for Area 1, but remediation in Area 2 (which is the MW-14 area) was apparently never implemented by Soco or Brenntag. Because the approved corrective action of Area 2 was never implemented, VOCs in groundwater below the Headquarter property have continued to increase.

There is no data identifying any current or historic source of VOCs on the Headquarters property. Prior to construction of the office building, this property was not used for handling organic liquids. Given that the source is from the adjacent property, additional assessment and remediation of volatile organic in soil and groundwater should be the responsibility of Brenntag. BES will certainly cooperate and provide input on future assessment and remediation activity, but responsibility for cleanup of soil and groundwater should be Brenntag's.

With regards to indoor air sampling results, available soil, groundwater, and historical operations data does not indicate any current or historic potential sources of perchloroethylene (perc), and perc is not a compound of concern in soil or groundwater. Given that this detection of perc is not consistent with historical data, prior to performing additional soil assessment, we believe additional indoor air assessment should be provided to confirm the presence of perchloroethylene and to determine if there are or were possible indoor sources.

With regard to the specific points raised in your letter of July 24, we want to provide the following responses:

Item 1: BES will work with Brenntag to put a coordinated sampling and reporting program in place. The next routine sampling is scheduled for December 2019. Prior to that event, we will report to DHEC regarding how the effort will be coordinated. Given the need to coordinate with both Brenntag and the current owner of the Headquarters site, we request an extension until November 15, 2019 to submit the schedule.

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Item 2: For future reports, we will have our consultants include a table showing results per well.

Item 3: As discussed above, Brenntag should have the contract for implementing the already approved remediation plan or primary responsibility for developing a new plan for remediation of the source material. We remain concerned that the focus should be on the source area near MW-14. During our discussions with Brenntag, BES will discuss strategies for source area remediation.

Item 4: BES will coordinate with Brenntag on a strategy for ongoing monitoring.

Item 5: With regards to indoor air sampling results, available soil, groundwater, and historical operations data do not indicate any source of perchloroethylene would exist on this site. Prior to performing additional soil assessment, additional indoor air assessment should be provided to confirm the continued presence of perchloroethylene and seek to identify possible indoor sources.

Item 6: As indicated above, given the source is clearly from the Brenntag property, any additional assessment should be the responsibility of Brenntag.

Item 7: Before scheduling a follow up meeting, it would be helpful to have additional data in hand to help direct discussion. We request that the follow up meeting be scheduled for November to allow time to review data and develop strategies.

We appreciate your time and consideration and would like to schedule a conference call to discuss the path forward. BES is certainly willing to continue cooperation and coordination with all parties, and we believe it is critical that Brenntag implement an active remediation program addressing the source and the resultant plume. We look forward to working with you, Bird and Brenntag.

Steve Burris



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