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SCANNED  
10-9-19

October 4, 2019

Burris Environmental Services.  
Attn: Mr. Steve Burris  
4310 Amsterdam Street  
North Charleston, SC 29418

Re: Response to your letter dated August 21, 2019

4210 Azalea Drive  
SCDHEC Site ID 400059  
Charleston County

Dear Mr. Burris:

The South Carolina Department of Health and Environmental Control (Department) has reviewed your letter dated August 21, 2019. We agree that the July 17 meeting between the Department, Burris Environmental Services, Inc. (BES), Brenntag Southeast, Inc. (Brenntag), and William Bird Company (Bird) was helpful, and appreciate the additional information that you provided in your letter.

I am not able to locate a copy of the 1993 Corrective Action Plan that you referenced. I would greatly appreciate if you could provide an electronic copy of this document. I do have an amendment to the Corrective Action Plan, dated May 20, 1999. This amendment indicated that the two approaches under consideration for Area 2 at that time were in-situ chemical oxidation and passive soil venting. It should be noted that one or both of these approaches could be pilot tested and implemented in the portion of Area 2 located on the Bird property with little risk of pulling in additional contamination from the adjacent property.

The Department understands that the release believed to be the *original source* of the contamination in Area 2 occurred on property currently under the control and ownership of Brenntag. However contamination existed in the area of the Headquarters building at the time the original parcel was subdivided. This contamination is the subject of Consent Agreement 180-01-W between the Department and BES. A Site Map dated May 15, 1990 and produced by GEL depicts three different locations on the headquarters site where releases are described. These releases are described as "1981 Dark Liquid," "1983 Dark Liquid" and "1986 Rust Colored Water." A water sample collected on 03/05/86 was found to contain 1,458 ug/L of trichloroethene, along with lower concentrations of other chlorinated and non-chlorinated volatile organic compounds (VOCs). Bird established itself as a Non-Responsible Party (NRP) under the South Carolina Hazardous Waste

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Management Act prior to taking ownership of the property. Therefore there is no other Responsible Party (RP) for the contamination at the subject site. Given that contamination exists on the Bird property, (and has existed since before the division of the property) BES remains responsible for remediation of contamination on the property addressed by Consent Agreement 180-01-W.

Your letter states that VOCs in groundwater below the Headquarter (Bird) property have continued to increase because corrective action was never implemented in Area 2. However, between 1997 and present, total chlorinated VOCs in MW-12 have decreased, while non-chlorinated VOC concentrations have fluctuated but remained relatively stable overall. Based on the data, both properties require active remediation. The 1997 Environmental Site Assessment (ESA) conducted on behalf of the William Bird Company went as far as to state that remediation should be conducted in the area of MW-12, rather than MW-9, and that to be effective, the remediation system would need to be installed on both the Southchem (now Brenntag) site, *and* the headquarters (now Bird) site. The Department recommends that BES evaluate technologies to address contamination on the Bird property. SCDHEC will continue to work with Brenntag to address groundwater contamination on property under Brenntag's control.

Consent Agreement 180-01-W requires semi-annual monitoring and reporting, and indicates that additional groundwater remediation may be required if 1) the concentration of volatile organic compounds in groundwater increases, or 2) if the site is not suitable for a Groundwater Mixing Zone or some other form of alternative risk-based concentrations. Based on the long-term persistence and high concentrations of both chlorinated and non-chlorinated VOCs, the presence of free-phase liquids, and the presence of an occupied structure in close proximity to contamination, the Department has determined that the site is not suitable for a Groundwater Mixing Zone.

With regard to Indoor air sampling results, your letter states that available soil, groundwater, and historical operations data do not indicate any source of perchlorethylene would exist on the headquarter site. A review of data from both sites indicates that perchlorethylene has historically been detected at low (less than 1 ug/L to 10s of ug/L) on the Brenntag site, primarily in Area 1, and at MW-8. On the Bird property, perchlorethylene has historically been detected at similar levels in MW-4, and once each in MW-9, MW-10, and MW-11. MW-12 contained perchlorethylene at 353 ug/l in September 1997 and 3,170 ug/l in November 1998. MW-12 was not sampled in many of the other sampling events due to the presence of floating product. For those events where perchlorethylene is listed as non-detected, detection limits were elevated due to the presence of high concentrations of other VOCs including TCE, cis-1,2-DCE and vinyl chloride.

A potential ongoing exposure has been identified through indoor air sampling conducted independently by Bird. The Department has repeatedly directed BES to assess the potential for vapor intrusion and conduct indoor air sampling since in March 2017. BES did conduct soil gas sampling on the Bird property in June 2018 and January 2019. Following our July meeting, the Department directed BES to submit a work plan to conduct indoor air sampling no later than August 31, 2019. BES has not complied with this directive. The Department concurs with your statement that additional indoor air assessment should be provided. BES should submit an indoor air sampling work plan as previously directed to collect this data as soon as possible.

The Department agrees that a conference call would be beneficial prior to meeting. Please contact me at 803-898-0733, or by email at [hornostr@dhec.sc.gov](mailto:hornostr@dhec.sc.gov) to schedule a conference call.

Best Regards,



Tim Hornosky, P.G., Project Manager  
Voluntary Cleanup Section  
Division of Site Assessment, Remediation & Revitalization

cc: Lucas Berresford, Manager Voluntary Cleanup Program, BLWM  
Wendy Boswell, Low Country EA (Charleston - McMillan)  
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