

**SCANNED**

August 30, 2018

Brenntag Southeast, Inc.
Attn: Mr. Shawn Wiram
2000 E. Pettigrew Street
Durham, NC 27703

Re: Review of First Semiannual 2018 Groundwater Monitoring Report dated 21 August 2018

Brenntag Southeast, Charleston, South Carolina
Consent Agreement 00-252-W
SCDHEC Site ID 50975
Charleston County

Dear Mr. Wiram:

The South Carolina Department of Health and Environmental Control (the Department) has reviewed the above referenced document. The following comments were generated during this review.

1. The Report cites the predominance of cis-1,2-dichloroethylene in the groundwater contaminant plume near MW-7 and MW-13 as evidence of biological breakdown. However, the ratios of parent (trichloroethylene) to breakdown products has not changed appreciably over the 25 year monitoring period, suggesting that breakdown has stopped. The concentrations present in this area are indicative of free-phase solvent, and the toxicity to microbes at these levels would preclude biological reduction. The Department recommends that pilot testing of active remedial measures be implemented for the area of MW-7 and MW-13.
2. The Department concurs with the recommendation to conduct additional AFVR events at MW-14 with the goal of determining whether this technology is appropriate for the remediation of source area 2. The Department would like to meet with you following completion of the proposed activities to discuss the results and the most appropriate path forward.

Please notify this office at least two weeks prior to the start of the next sampling event and/or AFVR event.

If you would like to discuss this project or the comments above, please feel free to contact me at your convenience. You can reach me by phone at (803) 898-0733, or by email at hornostr@dhec.sc.gov

Sincerely,



Tim Hornosky, P.G.
State Voluntary Cleanup Program
Bureau of Land and Waste Management

cc: Lucas Berresford, BLWM
Christine Sanford Coker, Low Country EA (Charleston/McMillan Office)
Steve Burton, Brenntag Southeast, Inc. (electronic copy)
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Michael G. Muthig, IPGX, Inc. (electronic copy)
BLWM File 50975