



SCANNED

July 24, 2019

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

Re: Review of Groundwater and Soil Vapor Assessment Report dated May 12, 2019  
4210 Azalea Drive  
SCDHEC Site ID 400059  
Charleston County

Dear Mr. Burriss:

I appreciated the opportunity to meet with you and representatives of Brenntag Chemical and William M. Bird & Company last week to discuss the status of the environmental contamination at the former Burriss Chemical site. I am hopeful that enhanced coordination between Burriss Environmental and Brenntag will result in significant progress toward eliminating contamination across the site and reducing risk to occupants of both properties.

The following comments were generated during review of the Groundwater and Soil Vapor Assessment Report dated May 12, 2019. The response actions and modifications recommended in these comments reflect those items discussed during our July 17 meeting.

1. Consent Agreement 01-180-W stipulates sampling is to be conducted on a semi-annual basis beginning between March 1, 2001 and April 30, 2001, with a report containing the results of sampling submitted to the Department no more than sixty days after the sampling event. As discussed in our meeting, the Department recommends that Burriss and Brenntag coordinate sampling events to provide concurrent data across the site. A coordinated semiannual sampling and reporting schedule should be submitted to my attention for approval no later than August 31, 2019.
2. Going forward, analytical data tables should be presented *per well* to facilitate assessment of biological and chemical degradation trends, rather than *per contaminant species*.
3. The report recommends that future aggressive fluid vapor recovery events be conducted only on the Brenntag property to avoid pulling contaminant mass toward

the Bird property. The Department appreciates this concern, however LNAPL and groundwater contamination on the subject property must also be addressed. As discussed in our meeting, AFVR should be conducted simultaneously at MW-12 and MW-14 for an extended period to effectively reduce contamination on both properties. In order to be effective, AFVR should be continued over multiple days.

4. LNAPL should be removed from MW-12 when present during future semiannual events, and MW-12 should be sampled when LNAPL is not present.
5. Indoor air sampling results suggest that a previously unidentified source of Perchloroethylene may exist beneath the headquarters building. Additional soil vapor and/or indoor air testing should be conducted to confirm or refute this possibility. A work plan to conduct this sampling should be submitted to my attention no later than August 31, 2019.
6. Results from newly installed monitoring wells (MW-17, 18, 19) have confirmed the previous results from MW-11 and suggest that groundwater contamination has migrated beyond the southern property boundary. Additional assessment of this area will be necessary to determine the most appropriate response actions. An assessment work plan should be submitted no later than September 30, 2019.
7. The Department requests a follow-up meeting for the week of September 30 to discuss progress toward meeting the objectives discussed in our July meeting.

The next semiannual report should be submitted to by attention in accordance with comment 1 above. If you have questions or wish to discuss these comments, please contact me at 803-898-0733, or by email at [hornostr@dhec.sc.gov](mailto:hornostr@dhec.sc.gov).

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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File # 50975