

SCANNED



May 4, 2018

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

Re: Review of Second Semiannual 2017 Groundwater Monitoring Report dated 16 April 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. No changes to the report are necessary. The following comments are provided to inform future remediation activities and for incorporation into future groundwater monitoring reports.

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 either 1) breakdown has stopped, or 2) there is an unaddressed source.
2. The Department notes that the levels of chlorinated solvents remain consistently several orders of magnitude greater than the cleanup goals established in Consent Agreement 00-252-W. These levels also suggest the likely presence of source material in the form of non-aqueous phase liquids or contaminant saturated soil.
3. The Department appreciates the inclusion of natural attenuation indicator parameters. There are some encouraging results for some of the wells, suggesting that bioaugmentation may be beneficial in achieving remedial goals.
4. The Department concurs with the recommendation to conduct an AFVR event at MW-14. Please coordinate these activities with Mr. Michael Muthig of IPGX, the consultant for the

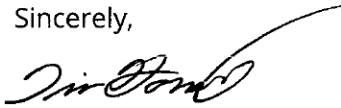
adjacent (W.M. Bird property). Mr. Muthig has discussed with the Department the potential for additional assessment activities in the area of MW-14.

5. The statistical evaluation in Appendix E Table 2 bears out the previous comments with regard to long-term trends at the facility. The Department recommends that pilot testing of active remedial measures be implemented for the area of MW-7 and MW-13.

As indicated previously, I would like to arrange to visit the site with your remedial contractor during the next scheduled sampling event. Please notify this office at least two weeks prior to the start of the next sampling 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)
Ed Hirshenson, Arcadis, 1450 Greene Street, Suite 220 Augusta, GA 30901-5201
Michael G. Muthig, IPGX, Inc. (electronic copy)
BLWM File 50975