SONOCO

November 26, 2014

Sent Via UPS

SCDHEC – BLWM
Solid Waste Enforcement
Attn: Beverly McLeod
2600 Bull Street
Columbia, South Carolina 29201-1708

Re: Consent Agreement 13-04-SW
Revised Table for Phase I Baseline Investigation Report

Dear Ms. McLeod:

Sonoco Products Company is pleased to submit this revised Table from the Phase I Baseline Investigation Report that includes the re-sampled results from SW-08. In the initial report it was noted that:

Total and dissolved cyanide were detected only in SW-08 at 17.2 and 2.45 µg/l, respectively. The total cyanide concentration exceeds the Criterion Continuous Concentration (CCC) for protection of freshwater aquatic life. Concentrations of total cadmium, copper, lead, mercury, nickel, and zinc exceed the Criterion Maximum Concentration (CMC) for protection of freshwater aquatic life in one sample (SW-08), but the dissolved concentrations of these metals did not exceed regulatory standards, suggesting that the detections in the unfiltered sample result from sample turbidity.

DHEC suggested and Sonoco agreed to retest the stream to determine if the turbidity caused the higher than expected result. The revised table shows the sample results to be what was expected and that the higher turbidity may have contributed to higher results as speculated in the original report.

Please e-mail me at cliff.chamblee@sonoco.com if you have any concerns about this additional data.

Sincerely,

Cliff Chamblee
Sonoco Products Company

TABLE 5. SUMMARY OF DETECTED CONSTITUENTS IN GROUNDWATER SAMPLES
PHASE I BASELINE INVESTIGATION REPORT BOILER ASH STAGING AREA
CONSENT AGREEMENT 13-04-SW
SONOCO PRODUCTS COMPANY

CONSTITUENT	FRACTION	UNITS	FRESHWATER AQUATIC LIFE		HUMAN HEALTH			SW-01		SW-02		SW-02-D		SW-03		SW-04		SW-05		SW-06		SW-07		SW-07-D		SW-08		SW-08 (Retest)		SW-09	
			CMC	CCC	WATER & ORGANISM	ORGANISM	MCL																								
Chloride	G	MG/L	NE	NE	NE	NE	NE	4.06		3.94		3.93		3.80		3.38		3.09		8.80		10.2		10.2		21.1				9.74	
Sulfate	G	MG/L	NE	NE	NE	NE	NE	3.33		2.61		2.58		1.91		1.56		1.15		9.50		6.70		6.74		6.31				8.23	
Cyanide, Total	G	UG/L	22	5.2	140	140	200	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	17.2		1.67	U	1.67	U
Cyanide - Dissolved	G	UG/L	22	5.2	140	140	200	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	1.67	U	2.45	J	1.67	U	1.67	U
Hexavalent Chromium	G	MG/L	16	11	NE	NE	100	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.0152		0.003	U	0.003	U
Hexavalent Chromium-Dissolved	G	MG/L	16	11	NE	NE	100	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U	0.003	U
Aluminum	METALS	UG/L	NE	NE	NE	NE	NE	112		120		123		126		180		128		123		163		171		4100		296		199	
Aluminum-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	53.3		56.1		25.1	J	39.1	J	65.2		71.5		37.3	J	101		99.4		42.8	J	48.1	J	72.5	
Arsenic	METALS	UG/L	340	150	10	10	10	1.70	U	1.70	U	1.70	U	1.79	J	1.70	U	1.84	J	2.62	J	1.70	U	1.70	U	1.70	U	1.70	U	1.70	U
Arsenic-Dissolved	METALS	UG/L	340	150	10	10	10	1.70	U	1.70	U	1.70	U	1.70	U	1.70	U	1.70	U	2.82	J	1.70	U	2.22	J	1.70	U	1.70	U	1.70	U
Barium	METALS	UG/L	NE	NE	1,000	NE	2,000	18.7		18.6		18.6		19.9		13.7		12.5		40.0		48.0		47.7		177		70.7		49.5	
Barium-Dissolved	METALS	UG/L	NE	NE	1,000	NE	2,000	18.0		17.6		17.3		18.1		12.3		12.5		40.8		46.9		46.4		53.4		56.0		48.7	
Cadmium	METALS	UG/L	0.53	0.1	NE	NE	5	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	1.57		0.179	J	0.110	U
Cadmium-Dissolved	METALS	UG/L	0.53	0.1	NE	NE	5	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U	0.110	U
Calcium	METALS	UG/L	NE	NE	NE	NE	NE	2500		2430		2700		2390		1570		1370		13200		6810		6740		6590		4690		5080	
Calcium-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	2440		2320		2310		2470		1390		1390		13600		6550		6700		3620		4410		5280	
Chromium	METALS	UG/L	580*	28*	NE	NE	100	2.00	U	2.00	U	2.00	U	2.00	U	3.12	J	3.21	J	2.00	U	2.04	J	2.22	J	5.11	J	2.00	U	2.00	U
Chromium-Dissolved	METALS	UG/L	580*	28*	NE	NE	100	2.00	U	2.00	U	2.00	U	2.00	U	2.00	U	2.21	J	2.00	U	2.00	U	2.40	J	2.00	U	2.00	U	2.00	U
Cobalt	METALS	UG/L	NE	NE	NE	NE	NE	0.252	J	0.267	J	0.247	J	0.272	J	0.281	J	0.229	J	0.428	J	0.863	J	0.847	J	13.0		1.23		0.890	J
Cobalt-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	0.237	J	0.243	J	0.226	J	0.248	J	0.220	J	0.202	J	0.327	J	0.809	J	0.837	J	0.248	J	0.792	J	0.840	J
Copper	METALS	UG/L	3.8	2.9	1,300	NE	NE	0.931	J	0.992	J	0.841	J	1.07		1.85		1.18		7.12		27.2		26.6		35.7		2.64		2.08	
Copper-Dissolved	METALS	UG/L	3.8	2.9	1,300	NE	NE	1.24		1.21		0.774	J	0.908	J	1.29		0.948	J	2.76		17.8		19.0		1.82		0.496	J	2.13	
Iron	METALS	UG/L	NE	NE	NE	NE	NE	1120		1140		1040		954		888		577		119		486		463		1170		146		198	
Iron-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	648		659		284		418		534		464		114		319		475		41.8	J	70.7	J	49.6	J
Lead	METALS	UG/L	14	0.54	NE	NE	NE	0.500	U	0.500	U	0.500	U	0.500	U	0.901	J	0.500	U	2.68		3.77		3.90		41.8		2.33		0.897	J
Lead-Dissolved	METALS	UG/L	14	0.54	NE	NE	NE	0.500	U	0.500	U	0.500	U	0.500	U	0.500	U	0.500	U	0.619	J	2.40		2.42		0.500	U	0.500	U	0.500	U
Magnesium	METALS	UG/L	NE	NE	NE	NE	NE	915		897		894		846		613		585		1610		1510		1490		1760		1930		1490	
Magnesium-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	895		847		845		913		562		602		1680		1460		1480		1400		1880		1490	
Manganese	METALS	UG/L	NE	NE	NE	NE	NE	21.6		22.0		21.2		21.9		20.1		17.0		39.7		29.1		28.2		272		36.8		22.7	
Manganese-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	20.1		20.0		19.9		20.8		15.7		15.2		35.2		28.5		31.1		9.68		32.3		21.2	
Mercury	METALS	UG/L	1.6	0.91	0.05	0.051	2	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	1.18		0.067	U	0.067	U
Mercury-Dissolved	METALS	UG/L	1.6	0.91	0.05	0.051	2	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U	0.067	U
Nickel	METALS	UG/L	150	16	610	4,600	NE	0.615	J	0.547	J	0.500	U	0.741	J	0.885	J	0.715	J	1.18	J	1.33	J	1.21	J	17.5		1.83	J	1.30	J
Nickel-Dissolved	METALS	UG/L	150	16	610	4,600	NE	0.878	J	0.944	J	0.596	J	0.663	J	0.780	J	0.555	J	1.59	J	1.30	J	1.59	J	2.04		0.891	J	1.56	J
Potassium	METALS	UG/L	NE	NE	NE	NE	NE	1280		1200		1190		1140		763		536		2720		2420		2380		2120		1550		2230	
Potassium-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	1330		1180		1140		1220		674		555		2840		2330		2360		1990		1520		2210	
Sodium	METALS	UG/L	NE	NE	NE	NE	NE	5470		5100		5190		4520		2440		2110		7480		9430		9220		14200		19000		8720	
Sodium-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	5580		5100		4910		4930		2400		2210		7760		9300		9280		14500		18600		8690	
Vanadium	METALS	UG/L	NE	NE	NE	NE	NE	1.00	U	1.00	U	1.00	U	1.00	U	1.00	U	1.00	U	3.55	J	1.00	U	1.00	U	1.70	J	1.69	J	1.00	U
Vanadium-Dissolved	METALS	UG/L	NE	NE	NE	NE	NE	1.00	U	1.00	U	1.00	U	1.00	U	1.00	U	1.00	U	2.62	J	1.00	U	1.00	U	1.00	U	1.00	U	1.00	U
Zinc	METALS	UG/L	37	37	7,400	26,000	NE	4.07	J	4.22	J	4.16	J	4.48	J	9.23	J	3.65	J	9.09	J	20.6		20.3		198		17.6		26.6	
Zinc-Dissolved	METALS	UG/L	37	37	7,400	26,000	NE	6.80	J	5.77	J	3.50	U	7.75	J	7.26	J	3.58	J	10.4		19.5		19.7		18.7		7.16	J	27.5	
Di-n-butylphthalate	SVOA	UG/L	NE	NE	2,000	4,500	NE	3.00	U	3.00	U	3.00	U	3.00	U	3.00	U	3.00	U	7.97	J	3.00	U	3.00	U	3.00	U			3.00	U