



SCANNED
8-20-18

August 17, 2018

Mr. Terefe Mazengia
GHD Services, Inc.
3075 Breckinridge Blvd
Suite 470
Duluth, GA 30096

RE: Groundwater Delineation & Soil Gas Investigation Report
Bluewater Thermal Solutions Site
Laurens, SC
File # 305608

Dear Mr. Mazengia:

The South Carolina Department of Health and Environmental Control (the Department) has reviewed and approves the Groundwater Delineation & Soil Gas Investigation Report, dated June 2018, for the Bluewater Thermal Solutions Site, in Laurens, South Carolina. The Department agrees with the recommendation to conduct a Laboratory Treatability Study to examine the possibility of In-Situ Chemical Oxidation as a Remedial Alternative for the Site.

As discussed in our August 15, 2018 meeting, the next steps towards remediation are to submit a Bench Scale Treatability Study Work Plan to assess different potential In-Situ Chemical Oxidation treatments. Upon completion of the Bench Scale Treatability Study a formal report should be submitted to the Department along with a Pilot Study Work Plan.

Additionally, the Department is still concerned about the potential of vapor intrusion at the Site. With the Target Soil Gas Concentrations for Commercial Vapor Intrusion being 1,600 $\mu\text{g}/\text{m}^3$ for Tetrachloroethene (PCE) and 100 $\mu\text{g}/\text{m}^3$ for Trichloroethene (TCE) and the Target Groundwater Concentrations for Commercial Vapor Intrusion being 65 $\mu\text{g}/\text{L}$ for PCE and 7.4 $\mu\text{g}/\text{L}$ for TCE. The exceedances of these Target Concentrations with 9,200 $\mu\text{g}/\text{m}^3$ of PCE in SG-2, 240 $\mu\text{g}/\text{m}^3$ of TCE in SG-2, 120 $\mu\text{g}/\text{L}$ of PCE in BH-7, 530 $\mu\text{g}/\text{L}$ of PCE in BH-8, 690 $\mu\text{g}/\text{L}$ of PCE in BH-6, and 11 $\mu\text{g}/\text{L}$ of TCE in BH-6. The locations of all of these exceedances indicate that there is a vapor intrusion issue in Building 5 and Building 6. The Department request that a mitigation for vapor intrusion be examined in the Focus Feasibility Study.

A Work Plan for the Bench Scale Treatability Study should be submitted to the Department on or before October 31, 2018. If you have any questions or concerns, please contact me at 803-898-2430 or rahnr@dhec.sc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Regan Rahn", with a long horizontal flourish extending to the right.

Regan Rahn, Project Manager
State Voluntary Cleanup Program
Bureau of Land and Waste Management

CC: Richard Scherer, Lippes Mathis Wexler Friedman, LLP
Lucas Berresford
Chris McCluskey
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