



May 24, 2023

Mr. Bennie L Underwood
De Maximus, Inc.
450 Montbrook Lane
Knoxville, TN 37919

Re: Federal Pacific Electric
BLWM# 51133, Consent Order 95-056-W
Edgefield County

Conditional Approval of Operations Plans, Source Area Removal and Treatment, dated May 11, 2023

Dear Mr. Underwood:

The South Carolina Department of Health and Environmental Control (the Department) has reviewed the Operations Plans, Source Area Removal and Treatment. The Operations Plans are approved with the conditions noted below. The associated Health and Safety Plan was also received as information.

1. The Work Plan indicates that monitoring and extraction wells will be removed as they are encountered. A well abandonment approval was issued on May 17, 2023. Wells must be abandoned in accordance with the South Carolina Well Standards and Regulation 61-71.
2. The O&M Operations Plan indicates that treated soils may be consolidated for backfilling when they have met (USEPA) Regional Screening Levels for groundwater protection, *or with the concurrence of SCDHEC, Industrial Soil Screening Levels*. The Department notes that the Industrial Soil Screening Levels are derived to estimate risk from direct contact with soils under an industrial use scenario. These numbers have no bearing on migration of contaminants to groundwater, and are normally not applicable to subsurface soils. In the event that treatment is less effective than indicated by the Source Area Removal and Treatment Field Test Results, the Department recommends extending the treatment interval, addition of amendments, or calculation of site-specific SSLs for groundwater protection.
3. The Department understands that recovered groundwater from the off-site extraction well network and Odell Reservoir toe drain will temporarily discharge directly to the Aiken County Public Service Authority sewer line. Please provide documentation from ACPSA documenting acceptance of this waste stream. This modification to the corrective action plan has not been approved by the Department for permanent implementation at this time.

As always, you can reach me at 803-898-0733 or by email at hornostr@dhec.sc.gov if you would like to discuss this project.

Best Regards,

A handwritten signature in blue ink, appearing to read "Tim Hornosky".

Tim Hornosky, P.G., Project Manager
State Voluntary Cleanup Program
Bureau of Land & Waste Management

cc: Lucas Berresford, BLWM
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File# 51133