



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

September 23, 2014

Mr. Kenny McCutcheon
Wix Filtration Corp LLC
1422 Wix Road
Dillon, SC 29536-7939

RE: Wix Filtration Corp, LLC
Site ID# 403139, VCC# 13-5996-RP
Dillon County

Approval of Remedial Investigation Report, dated August 21, 2014

Mr. McCutcheon,

The Department received the above referenced Remedial Investigation Report (report) on August 22, 2014. This report was submitted pursuant to Voluntary Cleanup Contract #13-5996-RP (VCC). The following comments were generated during this review:

1. General: The report is complete and is approved as written. No revision to the report is required. The Department's comments to the report are intended to guide Wix with respect to future response actions.
2. General: The report indicates that unacceptable non-cancer risk was identified for facility workers as well as utility/construction workers. Based on the results of the human health risk assessment, the Department has determined that a Focused Feasibility Study (FFS) is required to evaluate remedial alternatives for addressing contamination at the site.
3. Section 2.3.2 (Site Background) Remedy Evaluation and Implementation: The Department recognizes that an air sparge/soil vapor extraction (AS/SVE) remediation system has been in continuous operation at the site since December 2009 (ERM, Groundwater Monitoring Report, March 2014). However, the current system does not appear to be significantly reducing concentrations of toluene in groundwater. The FFS should include an analysis of the effectiveness of this system in reducing contaminant mass, and concentrations across the affected portion of the site. Site specific factors (geology/permeability/confining layers) and material compatibility may be hindering the AS/SVE system from effectively removing contaminant mass.
4. Section 3.2.3 Slug Tests: The report notes that slug testing could not be performed at well location MW-2 due to an obstruction in the well. As noted in the most recent Progress Report, shallow monitoring wells MW-2 and MW-13 have started to show signs

of significant deterioration from exposure of PVC well materials to high concentrations of toluene. Replacement of these wells should be incorporated into future response actions. As with replacement well MW-4R, these wells should be constructed using stainless steel rather than PVC. Replacement well screens should be positioned to bracket the water table surface.

5. Section 7.3.1.1 Exposure Setting Characterization: The report notes that based on the site's current zoning designation (ID-1) residential use is not permitted. Please note that Section 11 of Voluntary Cleanup Contract 13-5996-RP requires that Wix shall enter and file a restrictive covenant if Hazardous Substances in excess of residential standards exist at the Property after Wix has completed the actions required under the VCC. Zoning will not serve as a substitute for this action.
6. Section 7.4 Risk Characterization: While toluene is by far the predominant contaminant at the site, the Department notes that other constituents, particularly perchlorethylene (PCE) and trichloroethylene (TCE) were also detected at levels that represented a significant contribution to total risk for the Onsite Facility Worker Exposure scenario, as well as the Onsite Construction and Utility Worker Exposure scenario. Future response actions and remedial alternatives investigated in the FFS should be designed to address these constituents as well as toluene.

In order to ensure that the Focused Feasibility Study effectively addresses the Department's concerns with respect to the site, and to minimize the need potential need for revision, Wix should submit a brief work plan outlining the general approach and components of the FFS. This work plan should incorporate the above comments, and include a schedule for implementation. Please submit this work plan to my attention on or before October 31, 2014. As always, if you have questions, or would like to discuss this project you can reach me at (803) 898-0733, or by email at hornostr@dhec.sc.gov

Sincerely,



Tim Hornosky, P.G.
State Remediation Section
Division of Site Assessment, Remediation & Revitalization
Bureau of Land & Waste Management

cc: R. Gary Stewart, BLWM
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File # 403139