

W. Marshall Taylor Jr., Acting Director Promoting and protecting the health of the public and the environment

February 2, 2015

Mr. Eddie Lanier WestPoint Home LLC 523 Fob James Drive Valley, AL 36854

Re: WestPoint Stevens – Clemson Site #00895

Source Area Soils Characterization dated December 2013

Oconee County

Dear Mr. Lanier,

The Department has received and reviewed the referenced submittal and offers the following comments.

- 1. Page 2 mentions that in 2009, trenching activities were performed and sludge material with underlying impacted soils was discovered near the former facility laboratory. Please indicate to the Department whether this material and the underlying soil was removed or placed back in the trench.
- 2. The referenced report states, on page iv of the Executive Summary, that the soil contamination detected at the site is mainly found in the subsurface with the majority of the impact located at the interval just above the water table. The referenced report concludes that this soil impact is actually a "smear zone" for the contaminated groundwater, rather than a release from activities at the site, and therefore, no further work will be considered in this medium. However, the Department recommends remediation of the contaminated soil be included in the remediation plan due to the fact that the contaminant levels in these soils exceed the *Risk to Groundwater* soil screening levels (SSLs) and could be a continuing source of groundwater impact.
- 3. Industrial and residential SSLs should be compared to levels found in the surficial soils at a depth from 0-2' deep. The *Risk to Groundwater* screening levels should be compared to the entire soil column.

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Your response to these comments should be submitted to my attention on or before March 15, 2015.

Please feel free to contact me with any questions or comments at <u>walkeras@dhec.sc.gov</u> or at (803)898-0722.

Sincerely,

Addie Walker, Hydrologist State Remediation Section

Bureau of Land and Waste Management

CC: R. Gary Stewart, Manager, BLWM via email
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