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May 15, 2015

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Ms. Addie Walker, Project Manager
SC Department of Health and Environmental Control
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

SITE ASSESSMENT,
REMEDATION &
REVITALIZATION

Re: Comments on the Remedial Investigation Report
Delavan Spray Technologies Site
Bamberg, South Carolina
SCDHEC VCC Number 13-4762-RP
SCDHEC File Number 51778
AECOM Project Number 60314964

Dear Ms. Walker:

On behalf of United Technologies Corporation Aerospace Systems (UTAS), AECOM has prepared this correspondence to address comments presented in the May 6, 2015 letter from SCDHEC (Ms. Addie Walker) to United Technologies Corporation (Mr. Bill Penn).

Comment: The soil contaminant numbers derived from the latest sampling event at the site were screened against the USEPA Regional Screening Levels (RSLs) for residential soil and USEPA Soil Screening Levels (SSLs) for the protection of groundwater (MCL-based SSLs, May 2014). Please note, surface soils found from 0-2' below ground surface should be screened against the residential RSLs, and the entire soil column should be screened against the SSLs. Please edit the text and tables in the referenced document to reflect this.

Response: The comment refers to the screening of subsurface soil samples in Table 5-1. All of the samples screened in this table except one (DPT-46; 1.5 to 3.5 feet) were collected from depths greater than 2 feet bgs. The comment requests that only surface soils be screened using residential RSLs. Because all of the samples screened in this table are from subsurface soils, the column showing residential RSLs will be removed. As a result, only MCL-based SSLs will be used for screening the soil samples in Table 5-1, in accordance with the comment. The soil sampling results presented and discussed in Section 5 of the RI Report will be re-screened as indicated, and the text, table, and relevant conclusions will be revised as necessary. Edits to the RI Report will be provided as change-out pages and submitted to the Department by June 15, 2015. A .pdf document of the revised RI Report will also be submitted electronically for your convenience.

Comment: The Bureau of Land and Waste's Risk Assessor reviewed the Human Health Risk Assessment and did not have any risk related comments.

Response: Comment noted.

Comment: The groundwater contamination appears to be delineated in all directions except the southeast off-site. Further assessment in the deep limestone aquifer is recommended in this direction.

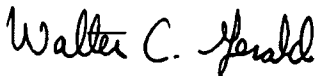
Response: AECOM understands that the Department will require additional delineation of PCE in the deep limestone aquifer off-site. However, we believe this should be to the southwest, down-gradient of monitoring well MW-22D. A work plan including additional delineation of the deep limestone aquifer off-site will be prepared and submitted to the Department by June 15, 2015.

Comment: Further soil assessment is needed in the areas of both degreasers.

Response: A work plan including additional delineation of soil in the vicinity of both degreasers will be prepared and submitted to the Department by June 15, 2015. AECOM proposes holding a Site walk prior to finalizing the Work Plan so that you can gain a better understanding of the limitation of working within the active manufacturing areas of the facility. AECOM will coordinate a Site visit with you and facility representatives if you desire to tour the facility.

If you have any questions or require further information, please feel free to contact me.

Sincerely,
AECOM Technical Services, Inc.



Walter C. Gerald, P.G.
Project Manager
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cc: Mr. Bill Penn – United Technologies Corporation
Ms. Evelyn Rogers, PE – AECOM
Ms. Leslee Alexander, PG – AECOM
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