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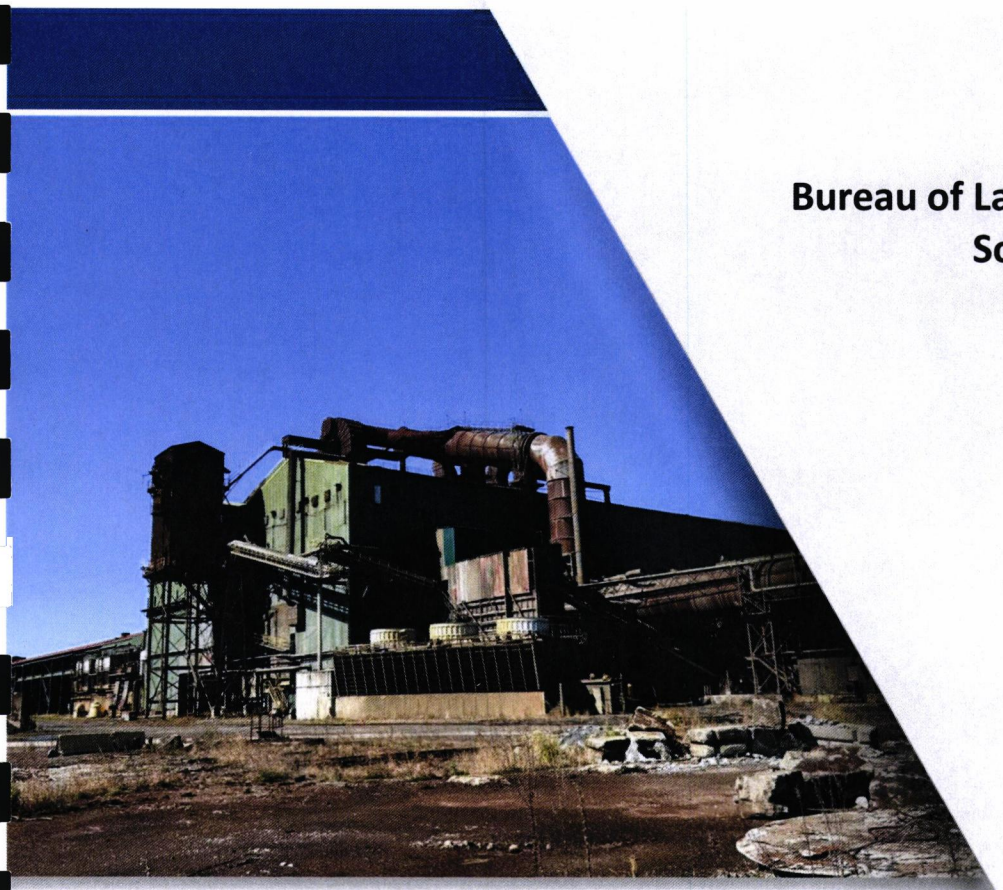
VOLUNTARY CLEANUP CONTRACT
BASELINE SITE ASSESSMENT WORK PLAN

LIBERTY STEEL PROPERTY
GEORGETOWN, SOUTH CAROLINA
VCC 25-8848-NRP



SUBMITTED TO

Brownfield Program
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, SC 29201

SUBMITTED FOR

Liberty River, LLC

10 State Highway 35, Suite 100
Red Bank, NJ 07701

RECEIVED
FEB 17 2026
SITE ASSESSMENT, REMEDIATION, & REVITALIZATION

February 11, 2026 | GEL PROJECT NO. RVDE00425

4

GEL Engineering LLC

111 Smith Hines Road, Suite J Greenville, SC 29607 P 864.676.2202

February 11, 2026

Mr. Nicholas W. Hammond
Project Manager
Brownfield Program
Division of Site Assessment, Remediation, and Revitalization
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, SC 29201

Re: Voluntary Cleanup Contract Baseline Site Assessment Work Plan
Liberty Steel Property
Georgetown, South Carolina
VCC 25-8848-NRP

Dear Mr. Hammond,

GEL Engineering, LLC (GEL) is pleased to submit this *Voluntary Cleanup Contract Baseline Site Assessment Work Plan* for the referenced property on behalf of Liberty River, LLC. The Work Plan is a requirement of Voluntary Cleanup Contract 25-8848-NRP.

If you need any further information or have any questions, please contact me at (864) 477-9243.

Sincerely,

Robert E. MacPhee
Principal

Enclosures

cc: Warren Waters, Liberty River, LLC (Electronic copy)

fc: rvde00425.vcc.workplan

GEL Engineering LLC

VOLUNTARY CLEANUP CONTRACT
BASELINE SITE ASSESSMENT WORK PLAN

LIBERTY STEEL PROPERTY
GEORGETOWN, SOUTH CAROLINA
VCC 25-8848-NRP

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This document entitled "Voluntary Cleanup Contract Baseline Site Assessment Work Plan," has been prepared for the Liberty Steel property located in Georgetown, South Carolina, at the request of and for the exclusive use of Liberty River, LLC, and the South Carolina Department of Environmental Services. It has been prepared in accordance with accepted quality control practices.

GEL ENGINEERING, LLC
a Member of The GEL Group, Inc.

Thomas R. Putney, P.G.
Senior Hydrogeologist
SC License #2272

Reggie C. Reeves
Senior Project Manager

Robert E. MacPhee
Principal

February 11, 2026
Date

1.0 INTRODUCTION

The South Carolina Department of Environmental Services (SCDES) and Liberty River, LLC (Liberty) entered into Voluntary Cleanup Contract (VCC) 25-8848-NRP (non-responsible party) for the Liberty Steel property located at 1227 Front Street, Georgetown, Georgetown County, South Carolina. The Property includes approximately 66 acres identified by Georgetown County Tax Map Serial Numbers 05-0025-059-03-00 (0.42 acres), 05-0028-022-00-00 (1.5 acres), 05-0028-023-01-00 (8.43), 05-0028-022-01-00 (0.51 acres), 01-0439-003-01-00 (7.5 acres), 05-0025-048-00-00 (0.45 acres), 05-0026A-001-00-00 (35.9 acres), 05-0026A-002-00-00 (9.1 acres), 05-0025-053-00-00 (0.22 acres), 05-0025-052- 00-00 (0.25 acres), 05-0025-057-00-00 (1.0 acre), and 05-0025-047-00-00 (0.5 acres). The location of the Property is shown on **Figure 1**, and a detailed site map is included as **Figure 2**.

The Liberty Steel Property (Property) is developed with an electric arc furnace (EAF) steelmaking plant that manufactured wire rod in coils. The plant is currently idled and the bag house and melt shop have been demolished by Liberty Steel. Liberty Steel intends to demolish all of the remaining structures. The major production equipment includes two alternating current EAFs, two ladle metallurgy stations, pre-heat furnace, casting machine, reheat furnace, and wire rolling mill. Support facilities include the rolling mill, casting area, melt shop, drum storage, offices, baghouse, receiving warehouse, guard shack, office trailer, maintenance shops, coil compacting area, mobile equipment shop, warehouse (also used to produce wire mesh), wastewater treatment plant (WWTP), mold repair shop, utility building, exterior storage areas, and dock (owned by Georgetown County). The northeast portion of the Property is the location of the former Direct-Reduced Iron (DRI) plant, which was removed in 2020-2021.

The area between the main mill and dock were used to store scrap metals, slag, mill scale, and other materials, and the southernmost parcels were used to store various materials including wire soils, slag and other unknown piles. Several rail spurs are located on the Property.

The Property was historically part of the Serenity Rice Plantation dating back to 1710 and operated until after the Civil War. Atlantic Coast Lumber operated a large lumber mill on the Property until the Great Depression. Prior to development of the steel mill, other site operators include Georgetown Chemical Works, a portion of American Cyanamid, Standard Oil Company, Riverside Oil Company, Georgetown Veneer, and Georgetown Plywood.

This Work Plan outlines investigation activities designed to evaluate and/or remove waste materials and segregated sources, and to evaluate the environmental condition of surface and subsurface soil, sediment, surface water, and groundwater, thereby fulfilling the requirements of the VCC. Liberty will initiate the Baseline Site Assessment upon SCDES approval of this Work Plan. As specified in the VCC, the results of this Baseline Investigation will be evaluated to determine the need for further assessment activities and/or remedial action for the intended reuse of the Property. Should the results identify constituents of potential concern (COPCs) above regulatory screening criteria, Liberty will take reasonable steps to address the COPCs in a manner that is protective of human health and the environment, and as appropriate for the planned reuse of the Property.

Once SCDES acknowledges satisfactory completion of the VCC, it will provide Liberty with a Certificate of Completion that recognizes the presence (or lack thereof) of existing contamination on the property. If hazardous substances above screening criteria exist at the Property after actions required under the VCC are completed, land use restrictions will be defined in the Certificate of Completion and SCDES may require that restrictive covenants be placed on the Property and registered with the Georgetown County Register of Deeds.

2.0 ENVIRONMENTAL ASSESSMENT AND CONDITIONS

A Phase I Environmental Site Assessment (ESA) was conducted by GEL Engineering, LLC (GEL) with a report dated April 25, 2025. The following recognized environmental conditions (RECs) were identified at the locations shown in **Figure 3** during the completion of this ESA:

- The historic uses of the Property as a steel mill, Atlantic Coast Lumber, Georgetown Chemical Works, a portion of American Cyanamid, Standard Oil Company, Riverside Oil Company, Georgetown Veneer, and Georgetown Plywood are considered RECs based on the potential to impact site soils and/or groundwater.
- The Property operated as a steel mill under various entities, including Georgetown Steel, ArcelorMittal, and most recently, Liberty Steel. These operations used a variety of chemicals and generated multiple waste streams. During years of site operations, multiple spills and releases have occurred. It is likely that prior to implementation of current environmental regulations, similar spills and releases occurred that were not contained using present-day requirements. The use of chemicals and generation of waste is considered a REC.
- Several offsite facilities are considered RECs based on their likely or known use of chemicals of concern, including:
    - Two dry cleaners along S. Fraser Street,
    - Two former facilities with gas tanks along S. Fraser Street,
    - Four former filling stations along Front Street, and
    - Four auto service facilities along S. Fraser Street.
    - American Cyanamid, which was partially located on the southeast portion of the Property. The area is now occupied by USALCO and its alum ponds.
- A release of hydraulic oil has occurred in the coil compacting area. Prior soil and groundwater assessments have identified petroleum, chlorinated solvents, and hydraulic oil in this area. The source area of the petroleum and chlorinated solvents is unknown, but may be a result of an offsite source along S. Fraser Street and/or former onsite operations. Two belt skimmers are currently in operation to remove free-product hydraulic oil in this area. The hydraulic release and ongoing remediation is considered a REC.
- The chlorinated solvents identified in the coil compacting area in 2012 have not been fully assessed. The observed concentrations near the hydraulic oil release area are well above

South Carolina Maximum Contaminant Levels (MCLs) for groundwater. Additionally, the 2012 assessment identified chlorinated solvents in manholes that were sampled and may be discharging to the WWTP and/or Sampit River. The presence of chlorinated solvents in site soils and groundwater is considered a REC.

- The facility is developed with a WWTP that receives process water and stormwater from the facility. At one point the WWTP was closed-out with SCDES approval, but was re-opened after Liberty Steel purchased the site in 2017. During WWTP closure, a crack was observed in the sludge drying bed, which could result in a release of wastewater into the underlying soil and groundwater. Additionally, process water and wastes are directed to the WWTP via underground drains, piping, and trenches. Sludges from the WWTP are stored onsite and subject to infiltration and overflow due to rainwater. Due to the unknown integrity of the WWTP, associated discharge conveyances, and sludge storage, the WWTP system is considered a REC.
- Significant waste material from the steelmaking process was identified in the electric arc furnace (EAF) melt shop/furnace and lime silo at the entrance to the EAF melt shop. The dust generated by the steelmaking process is a Resource Conservation and Recovery Act (RCRA) hazardous waste (hazardous waste code K061). Additionally, slag and mill scale produced during steelmaking can also be sources of metals. A prior RCRA inspection noted that baghouse waste was stored in open drums and observed on the top of a drum. The potential presence of these various materials in the EAF melt shop and baghouse area is a REC.
- Several sumps or subgrade structures are located throughout the Property. The integrity of the structures could not be evaluated during the site reconnaissance and are considered RECs, including:
    - Much of the equipment in the rolling mill has a subgrade pit to capture mill scale and other materials, including the scale pit. The pit contains water that is a result of stormwater and groundwater infiltration.
    - Small sumps were observed to the north of the main mill building near the cooling tower.
    - A sump and a covered subgrade structure were observed near the fuel oil ASTs tank farm along the northern side of the structure.
    - A set of sumps were observed near the truck wash area near the southwest portion of the mill property.
    - A service pit with water is located in the mobile equipment shop.

  - A sump is located behind the containment structure near the mold repair shop.
  - A sump is located beneath the work area in the mold repair shop.
  - The rolling mill is developed with the Morgan oil cellar, which contains two, 10,000-gallon hydraulic oil above-ground storage tanks (ASTs). The floor and walls of the cellar are covered in oil and a sump reportedly captures the oil.
  - A stormwater collection sump is reportedly located near the lime silo, where significant staining was previously observed.

- The Property is developed with several hydraulic systems, including one that has been identified as the source of hydraulic oil groundwater impacts in the coil compacting area. The hydraulic systems are located in the EAF area, rolling mill, and coil compacting area and contain varying quantities of oil, ranging between 50 and 2,800 gallons. The hydraulic systems are considered RECs.
- The exterior areas of the Property have historically been used for storage of scrap iron, debris, DRI pellets, slag, mill scale (material that falls off steel during the manufacturing process), mortar, lime, railroad ties, and other materials, including the southernmost parcel of the Property. The ground surface of the former DRI plant (northeast portion of Property) is covered in DRI pellets. Based on the historical use of the site to store these materials, it is possible they have been used as fill material on the site. Based on the potential to leach metals and other contaminants into site soils, the historic and current exterior storage of these materials is considered a REC.
- Significant staining was observed in the oil storage area in the mobile equipment shop and the waste oil storage area. Rainwater infiltration can occur in both of these areas, both of which were observed to contain water. Due to the potential to overflow their containment, these areas are considered RECs.
- A gasoline AST was observed near the utility building. Although no sheens or indications of a release were observed in the AST's secondary containment, fuel is dispensed via underground piping, the integrity of which could not be evaluated. The AST system is considered a REC.
- The north side of the main mill building is developed with fuel oil ASTs within secondary containment. Based on observations, it appears fuel oil may be transferred via underground piping, and is considered an onsite REC.
- A majority of the production floor is exposed soil. Staining was observed in various locations on the ground surface. Based on the heavy use of various oils, lubricants, and

other chemicals over decades of operating a steel mill, the potential exists for accumulation of these materials in site soils and/or groundwater and is considered a REC.

- RCRA records indicate that chlorinated solvents were previously used on the Property, likely in conjunction with machine and maintenance shops. These areas also typically use large quantities of oils and lubricants. Chlorinated solvents are reportedly no longer used on the Property. The historic use of chlorinated solvents is considered a REC.
- The facility is reportedly developed with at least three septic tanks that reportedly receive sanitary waste. The septic tanks do not contain leach fields, so the tanks are pumped out on a routine basis. Due to the unknown integrity of the tanks and the potential to receive non-sanitary waste, the septic tanks are considered a REC.
- The facility was reportedly developed with at least five underground storage tanks (USTs). All USTs have reportedly been abandoned, but no files pertaining to the closure of the systems were identified for review. Two releases occurred in association with the USTs: the first was reported in June 1993 and issued a letter of no further action (NFA) in July 1995 and the second was reported in December 1995 and issued an NFA in March 1990. Based on the lack of closure or assessment files, the former USTs are considered a REC.

Although not considered a REC, large quantities of materials were observed throughout the Property, including oils (ASTs, drums, and buckets), lubricants, laboratory chemicals and other materials used in the manufacturing process. These materials will need to be inventoried, characterized, and disposed in accordance with applicable regulations. The large quantity of chemicals in need of proper disposal is considered a Business Environmental Risk.

Potential asbestos-containing materials are likely located throughout the structures. Prior to renovation or demolition, an asbestos inspection should be conducted to evaluate for the absence/presence of asbestos-containing materials. The potential presence of asbestos-containing materials is considered a Business Environmental Risk.

3.0 PROJECT INFORMATION

3.1 Project Objectives

The objectives of the Baseline Site Assessment are to evaluate and/or remove waste materials and segregated sources, and to evaluate the environmental condition of the surface and subsurface soil, sediment, groundwater, and surface water at the Property. The results of the Baseline Site Assessment will be evaluated to determine the need for further assessment activities and/or remedial action for the intended reuse of the Property.

3.2 Project Personnel

Project personnel associated with and responsible for the implementation of this Baseline Site Assessment include:

- Mr. Bob MacPhee is a Principal at GEL and will serve as Project Manager. Mr. MacPhee is responsible for overall project coordination and communications with Liberty and SCDES.

  GEL Engineering, LLC
  111 Smith Hines Road, Suite J
  Greenville, South Carolina 29607
  (864) 676-2202 (o); 864-477-9243 (m)
  robert.macphee@gel.com

- Ms. Tracy Jones, P.G., will serve as the quality assurance/quality control (QA/QC) Officer for this project. Ms. Jones will provide technical support to project staff and be responsible for assuring that deliverables meet QA/QC requirements and project objectives.

  GEL Engineering of NC, Inc.
  1270 Hendersonville Road, Suite #6
  Asheville, North Carolina 28804
  (828) 782-3523
  tracy.jones@gel.com

- Mr. Reginald Reeves will assist with project implementation, oversight, and support of field activities, and communicate project findings to the Project Manager and QA/QC

Officer, as well as overall project coordination and communications with Liberty and SCDES.

GEL Engineering of NC, Inc.
1270 Hendersonville Road, Suite #6
Asheville, North Carolina 28804
(828) 782-3527
reggie.reeves@gel.com

- Mr. Robby Gardner, P.G, is the Project Geologist and will be responsible for conducting Baseline Site Assessment field activities and communicating project findings to the Senior Hydrogeologist, QA/QC Officer, and Project Manager. Other field personnel will be used as needed to meet project objectives.

  GEL Engineering, LLC
  2040 Savage Road
  Charleston, South Carolina 29407
  (843) 769-7378
  Robert.gardner@gel.com

Environmental media sampling activities will be performed by GEL. Analytical laboratory services will be provided by GEL Laboratories, LLC (GEL Labs), which possesses the applicable Certifications defined in 25A S.C. Code Regs. R.61-81 for the test methods specified in this Work Plan (SC Certification No. 10120001):

Ms. Julie Robinson
GEL Laboratories, LLC
2040 Savage Road
Charleston, South Carolina 29407
(843) 769-7393
julie.robinson@gel.com

The Liberty representative for this project is:

Mr. Warren Waters
10 State Highway 35 South, Suite 100
Red Bank, New Jersey 07701
(732)268-7104
ww@riverdev.com

Packaging, transportation, and off-site disposal of waste materials and segregated sources will be performed by a third-party subcontractor, if necessary.

3.3 Data Needs

Data requirements consist of evaluating the presence or absence of environmental impacts on surface and subsurface soil, sediment, surface water, and groundwater. GEL will also obtain data required to profile waste materials and segregated sources for appropriate off-site disposal, if necessary. Sample analyses will be performed per the requirements of the VCC for parameters and COPCs typically used at industrial sites. Per the VCC, analytical parameters will include the following: Target Analyte List (TAL) metals (excluding cyanide), hexavalent chromium, Target Compound List (TCL) VOCs, and semi-volatile organic compounds (SVOCs). Additionally, cyanide, TCL polychlorinated biphenyls (PCBs), TCL pesticides, and Perfluorinated Alkyl Acids (PFAS) will be analyzed in select samples. A summary of the samples to be collected and their assigned analytical parameters are provided in Table 1. Holding times, containers, and preservation requirements for the analytical methods for different sample media are provided in Table 2.

Baseline Site Assessment analytical methods will use appropriate detection levels to facilitate comparison to the screening criteria, specified as follows: Soil analytical data will be compared to the United States Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for residential and industrial land uses (November 2024 Summary Tables or most current at the time of sampling), and maximum contaminant level (MCL)-based Protection of Groundwater Soil Screening Levels (SSLs), if listed. Groundwater quality results will be compared to the primary MCLs in the South Carolina Primary Drinking Water Regulations, R.61-58, or if not specified in R.61-58, to the current EPA RSLs for tapwater. Detected constituent concentrations in sediment will be compared to EPA Region 4 Ecological Screening Values (ESVs) for marine sediment at hazardous waste sites (*Supplemental Guidance to ERAGS: Region 4, Ecological Risk Assessment*; March 2018). Detected surface water constituent concentrations will be compared to the South Carolina Water Classification and Standards R. 61-68 (June 27, 2014) based on the consumption of either "water and organism" or "organism only" as applicable.

Following the field sampling, the sample locations will be surveyed to document the locations of the samples and obtain elevation data for the newly installed permanent groundwater monitoring wells. GEL will evaluate the groundwater flow direction using the surveyed well data and the water level information obtained during the baseline investigation sampling.

Baseline Site Assessment results will provide further characterization of environmental conditions at the Site and will serve as the basis for determining the need for further site assessment activities and/or remedial actions for the intended use of the property.

3.4 Project Deliverables

Upon completion of the Baseline Site Assessment, GEL will prepare and submit to DES a *Baseline Site Assessment Report*. During the Baseline Site Assessment activities, GEL will provide status reports to DES that present a summary of the progress of the investigation and any proposed corrective measures or remedial actions if the project goes over a sixty-day duration.

4.0 BASELINE SITE ASSESSMENT ACTIVITIES

The following activities will be conducted to assess environmental conditions at the Property as specified by the VCC. Health and safety procedures to be followed while conducting the assessment activities will be specified in a "Health and Safety Plan" (HASP), which will be submitted to DES under separate cover.

4.1 Assess Waste Materials and Segregated Sources

The waste materials and segregated sources specified in the VCC and identified below will be characterized. Assessment will include an evaluation of contaminant concentrations and an estimation of the quantity or extent of each type of waste material or segregated source, as applicable, or as specified below.

- Any remaining USTs and associated piping located on the Property, which may require a geophysical survey to identify.
- Any remaining ASTs and associated piping located on the Property. If the secondary containment of any AST contains standing water, a sample of that water shall be collected and analyzed for TAL-Metals (with speciation to analyze for hexavalent chromium), TCL-VOCs, and TCL-SVOCs.
- Any oil or chemical containing vessels located on the Property, including but not limited to drums, buckets, totes, and intermediate bulk containers.
- Any waste material from the steelmaking process, including but not limited to baghouse dust, located on the Property.
- Any hydraulic systems and associated hydraulic oil reservoirs located on the Property.
- The on-site WWTP and any associated underground drains, piping, and trenches located throughout the Property.
- Sludge from the WWTP.
- Scrap material, debris, DRI pellets, slag, mill scale, and any other waste material that is found in piles throughout the Property. The volume of each pile shall be estimated, and a representative number of samples shall be collected for TCLP analysis.
- Any sumps, service pits, cellars, and other subgrade structures located throughout the Property. If water is present in any of these structures, a sample shall be collected and analyzed for TAL-Metals (with speciation to analyze for hexavalent chromium), TCL-VOCs, and TCL-SVOCs.
- Any septic tanks located on the Property, which may require a geophysical survey to identify.

- Building structures should be assessed for asbestos-containing materials.
- Any transformers, capacitors, and other electrical equipment shall be confirmed to not contain PCB oil.

Many of the waste materials/segregated sources identified above are being addressed during the ongoing decommissioning of the steel mill by the current owner. A report describing disposition of waste sources addressed during demolition will be prepared and issued under separate cover from the *Baseline Site Assessment Report*. Waste materials/segregated sources remaining after decommissioning is complete will be characterized and disposed, as necessary, in accordance with an additional work plan, which will be submitted to SCDES.

Any other waste material and segregated sources that may be discovered on the Property at any time during assessment, corrective action, or development activities shall also be characterized for disposal in accordance with applicable regulations. Upon discovery of any segregated source that has not yet released all of its contents to the environment, the segregated source shall be expeditiously stabilized or removed from the Property. SCDES will be immediately notified if a release of contamination occurs as a result of assessment, stabilization , or removal actions. The impact of the release will be assessed and necessary actions taken in accordance with a SCDES approved plan.

4.2 Conduct a Well Survey

Public and private wells used for drinking water supply within a one-half mile radius of the Property and wells used for irrigation or other non-drinking water use within a one-quarter mile radius will be mapped through a database review and by conducting a windshield survey. Sufficient information will be reported to allow SCDES to secure permission to sample the wells, if necessary.

4.3 Assess Soil Quality

Surface and subsurface soil samples will be collected and analyzed from each of forty-eight (48) locations on the Property. Approximate sample locations are shown on **Figure 4**. SC811 will be notified and private utility locators will be used, as necessary, prior to sampling to locate underground utilities. Sample locations will be adjusted, as necessary to avoid underground utilities. One surface soil sample (0-1 foot below ground surface) and one subsurface soil sample (2-foot minimum depth) will be collected from each of the following locations:

- Three (3) locations spaced throughout the southernmost parcel of the Property.

- Two (2) locations spaced throughout the former coil storage area located on a portion of the parcel identified by TMS number 05-0028-023-01-00.
- One (1) location near the truck wash area in the southwest portion of the Property.
- Two (2) locations along the rail spur on the southern portion of the Property.
- Three (3) locations in the area of the WWTP and adjacent scale pit, one (1) of which is near the location of the crack in the sludge drying bed.
- One (1) location near the former Riverside Oil Company building in the southwest portion of the Property.
- One (1) location near the former Atlantic Coast Lumber maintenance shop.
- One (1) location near the waste oil storage area adjacent to the mobile equipment shop.
- Two (2) locations in the area of the mobile equipment shop, one (1) of which is near the location of the service pit.
- Two (2) locations in the coil compactor area, one (1) of which is located proximal to MW-23.
- Two (2) locations near the mold repair shop, one (1) near the sump located behind the containment structure and one (1) near the sump located beneath the work area.
- One (1) location near the sludge mixing pad to the northwest of the mold repair shop.
- One (1) location near the gasoline AST with underground piping on the eastern side of the Property.
- Five (5) locations spaced throughout the rolling mill, with a preference for locations near the subgrade pit, scale pit, and Morgan oil cellar.
- Four (4) locations along the western edge of the rolling mill, with one (1) near the transformer vault, one (1) near the fuel oil ASTs, one (1) near the sump and covered subgrade structure adjacent to the fuel oil ASTs, and one (1) near the substation. The samples collected near the transformer vault and the substation shall be analyzed for TCL PCBs, in addition to the analyses listed below.
- Five (5) locations spaced throughout the scrap, scale, and slag storage area on the eastern portion of the Property.
- Two (2) locations in the EAF and Ladle Furnace area.
- Two (2) locations near the lime silo and associated sump.

- Three (3) locations near the baghouse and associated piping.
- Four (4) locations spaced throughout the former DRI plant area.
- One (1) presumed background location on the portion of the Property located to the west of South Fraser Street.

Due to ongoing decommissioning and demolition by the current owner, the soil assessment may be conducted in phases based on accessibility to portions of the site. Soil samples will be collected using a drill rig equipped with direct-push technology (DPT) or stainless-steel hand augers. DPT soil sampling consists of pushing/hammering a 4-5-foot stainless-steel Macro-Core soil sampler and acetate liner to the desired sampling depth. Upon retrieval, the liner is removed from the soil sampler and cut to expose a continuous soil core for sampling. In cases where access is limited and site conditions prevent the use of DPT, soil samples will be collected using hand augers. Hand augers will be advanced to the desired sampling depth at each location. The auger buckets will be emptied into clean stainless-steel bowls or resealable plastic bags so that samples can be collected and lithologic descriptions can be recorded on soil boring logs. Auger buckets, bowls, and any other non-disposable sampling equipment will be cleaned in the field between soil boring locations.

Surface soil samples will be collected at a depth of 0-1 foot below land surface (bls) and most subsurface soil samples will be collected at a depth of 2-3 bls. Subsurface soil samples near the subgrade pits, scale pits, and Morgan oil cellar will be collected from the interval immediately above the water table. Physical indications of impact, such as odors or staining will be noted on soil boring logs. Soil from each boring will be field screened for organic vapors at 1-foot intervals using a photoionization detector (PID).

All soil samples will be analyzed for TAL metals, hexavalent chromium, and TCL SVOCs. Note that TAL metals analysis does not include cyanide. Subsurface samples will also be analyzed for TCL VOCs. A minimum of ten percent of the surface and subsurface samples will also be analyzed for cyanide, TCL pesticides, and TCL PCBs. A summary of the soil samples and analytical parameters is included in **Table 1**. Analytical methods, sample containers, and sample preservation requirements are summarized in **Table 2**.

4.4 Assess Groundwater Quality

Groundwater quality and flow direction will be assessed across the Property. Assessment shall include samples from thirty-eight (38) temporary, permanent, and existing monitoring wells. Due to ongoing decommissioning and demolition by the current owner, the groundwater assessment

may be conducted in phases based on accessibility to portions of the site. Existing and proposed groundwater monitoring locations are shown on **Figure 5**. SC811 will be notified and private utility locators will be used, as necessary, prior to well installation to locate underground utilities. Well locations will be adjusted, as necessary to avoid underground utilities. Specific locations will be as follows:

- Two (2) locations on the southernmost parcel of the Property.
- One (1) location in the former coil storage area located on a portion of the parcel identified by TMS number 05-0028-023-01-00.
- One (1) location near the truck wash area in the southwest portion of the Property.
- One (1) location on the southwest corner of the Property near the former Riverside Oil Company building.
- One (1) location immediately downgradient of the WWTP.
- One (1) location near the waste oil storage area on the south side of the mobile equipment shop.
- One (1) location along the western boundary of the Property near the former Atlantic Coast Lumber maintenance shop.
- Existing monitoring wells MW-18, MW-19, MW-20, MW-21, MW-22, MW- 23, MW-CA-1, MW-CA-2, MW-CA-3, and MW-CA-4, if accessible and viable for sampling.
- One (1) location downgradient of the coil compactor area.
- One (1) location near the service pit in the mobile equipment shop.
- Three (3) locations along the western edge of the rolling mill adjoining South Fraser Street, with one (1) near the transformer vault, one (1) near the fuel oil ASTs, and one (1) near the machine shop.
- Two (2) locations along the northwest boundary of the Property.
- One (1) location at or immediately downgradient of the Morgan oil cellar.
- One (1) location at or immediately downgradient of the subgrade pit in the rolling mill.
- One (1) location in or immediately downgradient of the EAF and Ladle furnace area.
- One (1) location near the lime silo sump.
- One (1) location near the baghouse.

- One (1) location near the mold repair shop sump.
- Three (3) locations along the eastern edge of the Property, one (1) of which is located near the gasoline AST with underground piping.
- Two (2) locations in the former ORI plant area.
- One (1) presumed background location on the portion of the Property located to the west of South Fraser Street.
- One (1) deeper well to investigate the vertical extent of chlorinated VOC impact near the coil compactor area. Specific location to be determined based on results from sampling of existing wells and discussions with SCDES.

To assess groundwater quality at the Property and evaluate the groundwater flow direction, temporary and permanent shallow monitoring wells will be installed in areas of the identified RECs, and monitoring wells installed for previous assessments will also be sampled, as specified by the VCC. The proposed temporary wells are in locations undergoing decommissioning and demolition activities. Based on the results obtained from the temporary wells, permanent wells may be installed in selected areas after demolition is complete. The permanent wells will be installed in outlying areas of the Property generally outside the area of the demolition activities and in the areas downgradient of the chlorinated solvent plume in the vicinity of the coil compacting area.

The well locations will be cleared for the presence of underground utilities and drill rig access and adjusted as needed. The shallow wells will be set so that the well screen brackets the water table. New monitoring wells will be installed by a South Carolina-certified well driller in accordance with South Carolina R.61-71 Well Standards (SCDES, May 27, 2016), using 4.25-inch inner diameter hollow or solid stem augers, or DPT, as appropriate.

Temporary wells proposed for areas of the Property undergoing active demolition will be installed using a drill rig equipped with DPT or a drill rig employing conventional augers. Based on the results obtained from the temporary wells, permanent wells may be installed in selected areas after demolition is complete and in coordination with SCDES. All equipment used in the installation and sampling process will be decontaminated using a steam cleaner prior to use at the site and between sample locations. The DPT drill rig utilizes static force and percussion to advance the sampling equipment. The direct push groundwater sampler consists of a 4-foot long, 1-inch diameter, stainless steel screen encased in a 1.5-inch diameter stainless steel probing tool which has an expendable point. The screen remains sealed as the probing tool is advanced into the subsurface. Once the desired sample depth beneath the water table is reached, the outer casing surrounding

the screen is retracted, thus exposing the screen to groundwater. In the event that the direct push groundwater sampler is not effective in obtaining a groundwater sample one inch PVC with a five or ten foot screen will be installed in the DPT boring or an augered borehole. A sand pack will be emplaced around the screen prior to sampling. The water table at the Property is estimated to be 5 to 10 feet below land surface (bls) and groundwater samples will be collected at an estimated depth of 8-12 feet bls.

To collect the groundwater sample, disposable tubing will be lowered through the center of the probing tool into the exposed screen. The tubing will be connected to a peristaltic pump and the temporary screening point will be developed to obtain a representative groundwater sample. To reduce the loss of volatile COCs of concern, the tubing will be pinched, removed from the well, and the collected water will be poured into laboratory grade 40 milliliter (mL) vials. Laboratory quality nitrile gloves will be worn by sampling personnel throughout the sampling process and will be changed, at a minimum, prior to sampling each well. A generalized temporary monitoring well schematic is provided as **Figure 6**.

Permanent wells will be constructed with a 2-inch diameter, flush-threaded polyvinyl chloride (PVC) well casing and a 10-foot-long, 0.010-inch machine-slotted well screen. A filter pack of No. 2 washed quartz sand will be emplaced around the screen from the total well depth to approximately 2 feet above the screen. Approximately 2 feet of bentonite pellets will be poured on top of the filter pack and hydrated to form a seal. The wells will be grouted with neat Portland cement to the land surface. The wells will be finished with a watertight lockable well cap on the 2-inch diameter riser pipe and a 2-foot by 2-foot concrete pad, and a lockable steel flush-mounted or upright protective casing. **Figure 7** provides a schematic for an upright permanent monitoring well. Following installation, monitoring wells will be developed using a submersible pump until the groundwater is relatively sediment-free, and pH and specific conductivity readings stabilize, as practicable.

Groundwater samples will be collected from newly installed permanent monitoring wells no sooner than the day following development. The newly installed and existing wells will be sampled using a submersible or peristaltic pump. Before sample collection, at least three casing volumes will be evacuated to ensure that groundwater samples are representative of the water quality in the aquifer immediately surrounding the new wells. Indicator parameters, including turbidity, specific conductance, pH, and temperature, will be measured in the field and recorded following the evacuation of each casing volume. Wells will be considered adequately evacuated, and groundwater samples will be collected when turbidity has stabilized or is below 10 Nephelometric Turbidity Units, pH measurements remain constant within 0.1 standard units of

each other, specific conductivity varies by no more than 10 percent, and the temperature remains within 5 percent for at least three consecutive readings, as practicable. The field measurements will be recorded on a Groundwater Sampling Field Data Sheet for each well.

If the monitoring well is evacuated to dryness before yielding three casing volumes, the evacuation procedure will be modified. Specific conductance, pH, and temperature will be measured following the removal of each casing volume during the evacuation process until dryness occurs. The total volume evacuated will be recorded on the Groundwater Sampling Field Data Sheet, and the well will be allowed to recover. Once the well has adequately recovered, the indicator parameters will be measured and recorded, and samples will be collected. Alternatively, low-flow sampling procedures may be used to collect representative groundwater samples so that minimal investigation-derived waste (IDW) is generated.

As listed in Table 1, analyses required by the VCC for every groundwater sample include TCL VOCs, TCL SVOCs, TAL metals, and hexavalent chromium. Additionally, 10 percent of the wells will also be analyzed for TCL PCBs, TCL pesticides, and cyanide. An additional analysis of TAL metals and hexavalent chromium will be conducted on a field-filtered groundwater sample to be collected from each well (i.e., dissolved metal concentrations) to evaluate the influence of sample turbidity on metal concentrations in groundwater. Selected wells will also be analyzed for PFAS.

Groundwater samples will be collected in laboratory-clean, sample containers that are pre-dosed with preservatives required for the analytical parameters specified in **Table 1** for each well. Groundwater sample analytical methods, holding times, containers, and preservation requirements are listed in **Table 2**. Laboratory-quality nitrile gloves will be worn by sampling personnel throughout the sampling process and changed, at a minimum, between each well. Upon collection, the sample bottles will be placed on ice in a cooler and transported to the analytical laboratory under proper chain-of-custody procedures.

4.5 Assess Surface Water and Sediment Quality

A minimum of four (4) sediment and four (4) water samples from standing water, if present, and storm drains, if accessible on the Property, will be sampled and analyzed. The samples shall be collected from the following locations, shown on **Figure 5**:

- One (1) sediment and corresponding water sample from standing water in the bermed, ponded area on the southernmost parcel.
- One (1) sediment and corresponding water sample from standing water in the downgradient area within the former DRI plant.

- One (1) sediment and corresponding water sample from standing water near the coil compacting area.
- One (1) water sample from the most downstream accessible point on each of the storm drains or effluent discharge pipes.

Sediment and surface water samples will be collected in laboratory-clean, sample containers that are pre-dosed with preservatives required for the analytical parameters specified in **Table 1** for each well. Sediment and surface water sample analytical methods, holding times, containers, and preservation requirements are listed in **Table 2**. Laboratory-quality nitrile gloves will be worn by sampling personnel throughout the sampling process and changed, at a minimum, between each sample location. Upon collection, the sample bottles will be placed on ice in a cooler and transported to the analytical laboratory under proper chain-of-custody procedures.

All sediment and surface water samples will be analyzed for TAL metals, hexavalent chromium, TCL VOCs and TCL SVOCs.

4.6 Evaluate and Control Impacts to Indoor Air

Potential impacts to indoor air quality will be evaluated in a subsequent assessment if SCDES determines that concentrations of VOCs present in the subsurface pose a threat to indoor air quality based on EPA "OSWER Technical Guide for Assessing and Mitigation the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air", dated June 2015, and supplemental EPA guidance ("Vapor Intrusion Technical Guide"). SCDES's decision will be directed towards predicting residential or commercial exposures consistent with buildings proposed for construction at the Property. If data from the Property indicates the potential for vapor intrusion, a vapor intrusion assessment work plan will be submitted under separate cover to SCDES for approval.

4.7 Field Quality Control Sampling

To supplement the laboratory QA/QC analyses prescribed by the EPA laboratory methods, three additional types of QC samples to be collected and submitted for laboratory analysis are field duplicates, equipment blanks, and trip blanks, as indicated in Table 1. One field duplicate subsurface soil sample for every 20 soil samples and one field duplicate groundwater sample for every 20 groundwater samples will be collected for analysis of TAL metals, hexavalent chromium, TCL VOCs, SVOCs, cyanide, TCL PCBs, and TCL pesticides. The groundwater duplicates will also be analyzed for filtered TAL metals and hexavalent chromium. One blank will be collected from

equipment used for soil sampling, and one blank will be collected from equipment used for groundwater sampling. The equipment blanks will be collected by pouring laboratory-grade deionized water over the cleaned reusable equipment and/or unused disposable equipment and collecting it in sample containers. Equipment blanks will be submitted for analysis of TAL metals (excluding cyanide), TCL VOCs, and TCL SVOCs. Trip blanks will be prepared by the laboratory for analysis of TCL VOCs. One trip blank will accompany each set of field samples submitted for VOC analysis.

4.8 Sample Identification

Samples collected during this Baseline Site Assessment will be designated with the Site-specific prefix "LS." Soil samples will be identified with "SB" followed by a two-digit number to identify the soil boring from which the samples were collected and an additional number indicating the bottom depth of the sample. Groundwater samples will be designated with "MW" or "TW" and segregated source samples, if collected, will be designated with "SS," followed by the two-digit location designation. Surface water and sediment samples will be designated with "SW" and "SD," respectively. Field duplicate samples will include a "DP" suffix. Blanks will be designated with "EB" (equipment blank), or "TB" (trip blank) followed by the day on which they are collected. The following examples are provided for clarity.

LS-SB-03-1.0	Surface soil sample collected from a depth of 0-1 ft BLS at soil boring LS-SB-03.
LS-SB-04-3.0	Subsurface soil sample collected at a depth of 2-3 ft BLS at soil boring LS-SB-04.
LS-SB-04-3.0-DP	Field duplicate of subsurface soil sample LS-SB-04-3.0.
LS-MW-02	Groundwater sample collected from monitoring well LS-MW-02.
LS-MW-02-DP	Field duplicate groundwater sample collected from monitoring well LS-MW-02.
LS-EB-110526	Equipment blank collected on November 5, 2026.
LS-TB-110526	Trip blank accompanying VOC samples submitted to the laboratory on November 5, 2026.

4.9 Sample Equipment/Decontamination

Non-disposable sampling equipment and down-hole measuring tapes will be decontaminated between each use using laboratory-grade detergent and scrub brushes, followed by potable water and lab-purified water rinses. All wastewater from the decontamination procedures will be containerized in a 55-gallon steel drum with a label and lid and stored onsite. When possible, the use of non-disposable sampling equipment will be limited to reduce the need for field decontamination and the potential for cross-contamination.

4.10 Disposal of Investigative Derived Waste

Investigation derived waste (IDW) including purge water, development water, and soil cuttings from monitoring well installation will be containerized in 55-gallon steel drums with labels and lids and stored onsite pending receipt of the soil and groundwater analytical results.

The analytical results will be evaluated to assess whether off-site disposal of the contained fluids and soil is warranted, or if the drums can be emptied on-site. Should analytical results indicate that off-site disposal of the IDW is warranted, the IDW will be properly profiled and manifested, and transported to an appropriately permitted disposal facility.

4.11 Environmental Laboratory Analysis

GEL will subcontract GEL Labs to perform analytical services consistent with the laboratory scope of work (SOW). The SOW ensures that laboratory activities are consistent with acceptable QA/QC practices and will meet the project objectives described in this Work Plan.

GEL Labs has demonstrated the ability to successfully perform a wide variety of commercial and government projects. GEL Lab's comprehensive Quality Assurance Program (QAP) has been audited and approved by State and Federal agencies. GEL Lab participates in the EPA's and Department of Energy's nationwide audit programs and inter-comparison studies. GEL Lab's quality program meets the requirements of these programs from sample log-in to disposal. The GEL Lab QAP is designed to comply with the guidelines and specifications outlined in the following:

- NELAC 2003
- TNI 2009
- ASME/NQA-1

- ANSI/ISO/IEC 17025-2005
- QAPPs, U.S. EPA QA/R5
- Department of Energy Order 414.1B, 414.1C, and 414.D
- Current U.S. EPA CLP statements of work for inorganic and organic analyses
- ANSI N42.23-1996 Measurement and Associated Instrument Quality Assurance for Radioassay Laboratories
- DOE STD 1112-98
- Performance Criteria for Radiobioassay- ANSI N13.30-1996.
- MARLAP
- U.S. Department of Energy Quality Systems for Analytical Services Revisions 3.0 and 3.1
- U.S. Department of Defense Quality Systems Manual, Revision 4.2,5.0 and 5.1
- 10 CFR Part 21- Reporting of Defects and Noncompliance
- 10 CFR Part 50 Appendix B -Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
- 10 CFR Part 61- Licensing Requirements for Land Disposal of Radioactive Waste
- NRC REG Guide 4.8
- NRC REG Guide 4.15

4.11.1 Sample Receipt, Handling, and Custody

Chain-of-custody (COC) forms document sample possession from the sampler to the laboratory and contain unique sample identification numbers and descriptive information about each sample. Individuals relinquishing and receiving the samples will sign, date, and note the time of transfer on the COC.

Samples will be securely packed in coolers with enough ice to chill the samples to less than 6 °C until received by the analytical laboratory. While in the laboratory, samples will be stored and maintained between 0.1 and 4.4 °C. Upon arrival at the laboratory, the following procedures will be performed by laboratory personnel:

- Note the absence/presence and condition of custody seals for each cooler.
- The cooler will be opened, the chain-of-custody record and the airbill (present only if shipped) will be removed, and their presence/absence and the number will be recorded on the Sample Receipt and Review Form.
- The cooler temperature will be checked and recorded on the Sample Receipt and Review Form.

- The numbers on the containers will be checked to ensure they match the numbers on the chain-of-custody record.
- In the Laboratory Information Management System (LIMS) unique accession number is assigned to the analytical batch, and a sample identification number is assigned to each sample within the analytical batch.
- The Sample Receipt and Review Form will then be completed, signed, and dated.
- The chain-of-custody record will be signed in the "received by laboratory" box. Any problems or discrepancies will be noted in the remark section of the chain-of-custody record.
- The samples will be logged in on the LIMS.
- Checked-in samples will be transferred to the appropriate refrigerator in a controlled-access room.

Upon cooler receipt, any discrepancy between the chain-of-custody, sample containers, or quote will be noted on the sample receipt form. The sample receipt form will be used to generate the sample acknowledgment letter that will be sent to the project manager or field team leader within 24 hours of sample receipt. The laboratory will notify the project manager or field team leader immediately if any discrepancies between cooler contents, chain-of-custody, or lab scope of work are encountered, and will also document the discrepancy in a corrective action report and case narrative. The laboratory project manager, along with the project manager or the field team leader, will work to resolve the discrepancy and correct the problem.

4.11.2 Analytical Procedures

Samples will be analyzed using EPA-approved methods, which are shown in Table 2. Table 2 also includes the holding times, containers, and preservation requirements for each analysis. New, certified clean sample containers will be provided by the laboratory. Estimated numbers for environmental media and QA/QC samples are shown in Table 1. In addition to the field samples, laboratory QA/QC samples (laboratory duplicates, laboratory control spikes, matrix spikes/matrix spike duplicates) will be analyzed by the lab at a rate of one per 20 field samples, as required by the analytical methods.

4.12 Project Documentation

Project documentation for sampling activities will include field logbooks, soil boring logs, groundwater sampling field data sheets, sample labels, and COC forms. The logbooks will document field sampling activities; the sample labels and COC forms constitute the sample

tracking system. Copies of project documents will be kept at the project office for the duration of data collection activities, as well as archived for reference at GEL's corporate office.

5.0 REPORTING

Upon completion of the investigation activities described above, a *Baseline Site Assessment Report* will be prepared and submitted to SCDES. Due to ongoing decommissioning and demolition by the current owner, the soil and groundwater assessment may be conducted in phases based on accessibility to portions of the site. The report(s) will be prepared per accepted industry standards and shall be certified by the signature and seal of a South Carolina-licensed Professional Geologist. The report will include the following:

- A discussion of investigation methods and any deviations from the DES-approved Work Plan.
- Tables and figures that summarize the generated data.
- A surveyed site map that documents sampling locations.
- A map showing measured groundwater elevations and interpreted groundwater flow directions.
- Documentation of field observations, including sample descriptions and field screening results.
- Laboratory analytical reports.
- An assessment of the results and recommendations.

The report will be submitted to SCDES in the form of one hard copy and one electronic copy of the entire report in PDF format on a compact disk or other digital medium.

6.0 SCHEDULE

GEL is prepared to begin implementation of this Work Plan upon approval by SCDES and site accessibility. It is anticipated that the Baseline Site Assessment Report will be submitted within eight to ten weeks of initiating Baseline Site Assessment activities.

FIGURES

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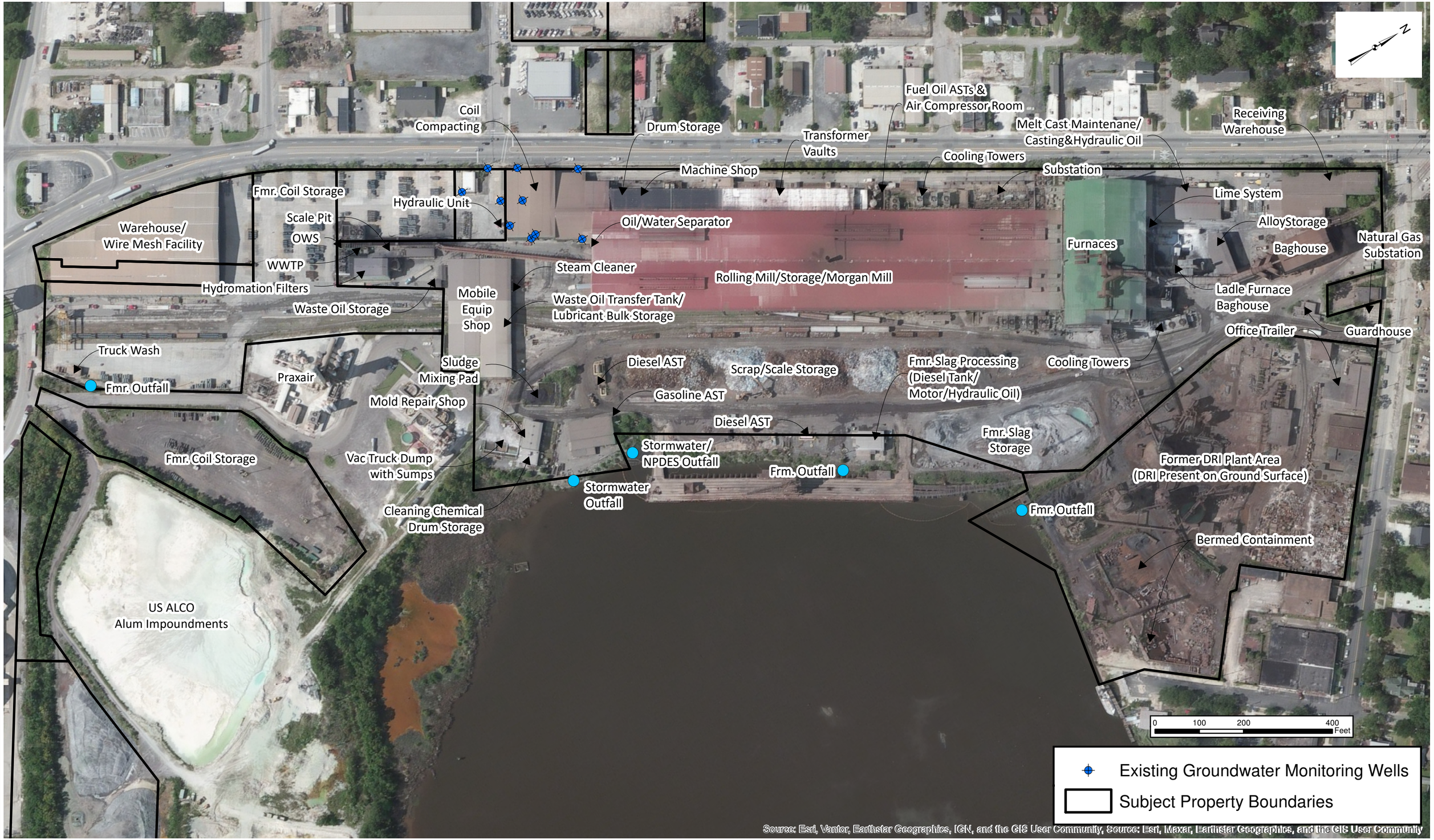
VCC BASELINE SITE ASSESSMENT WORK PLAN
LIBER?Y STEEL PROPERTY
S. FRASER STREET
GEORGETOWN, SOUTH CAROLINA
VCC 25-8848-NRP

SITE LOCATION MAP

PROJECT: RVDE00425 | DATE: JANUARY 20, 2025 | FIGURE 1



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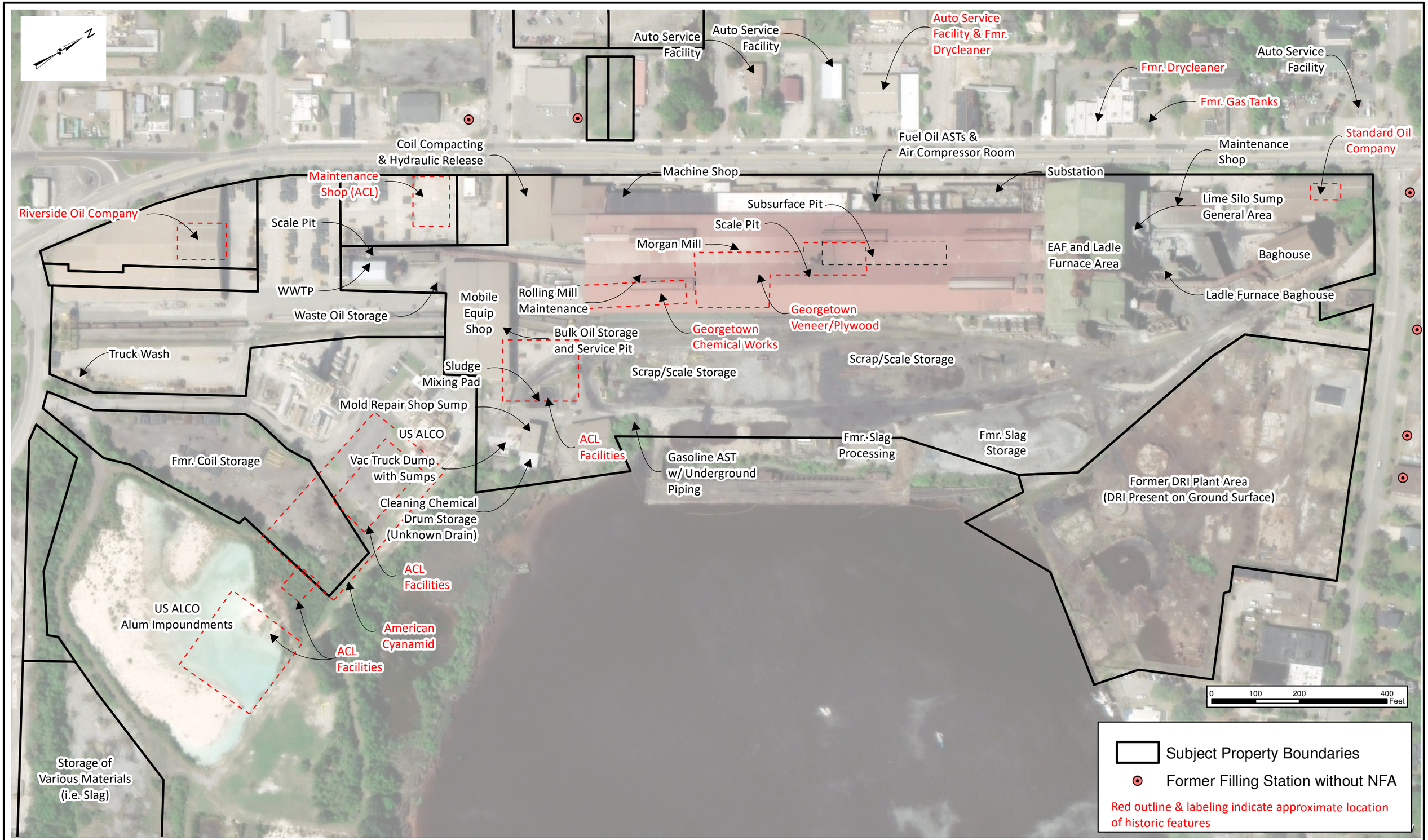
VCC 25-8848-NRP

DETAILED SITE MAP

PROJECT: RVDE00425	DATE: JANUARY 20, 2026	FIGURE 2



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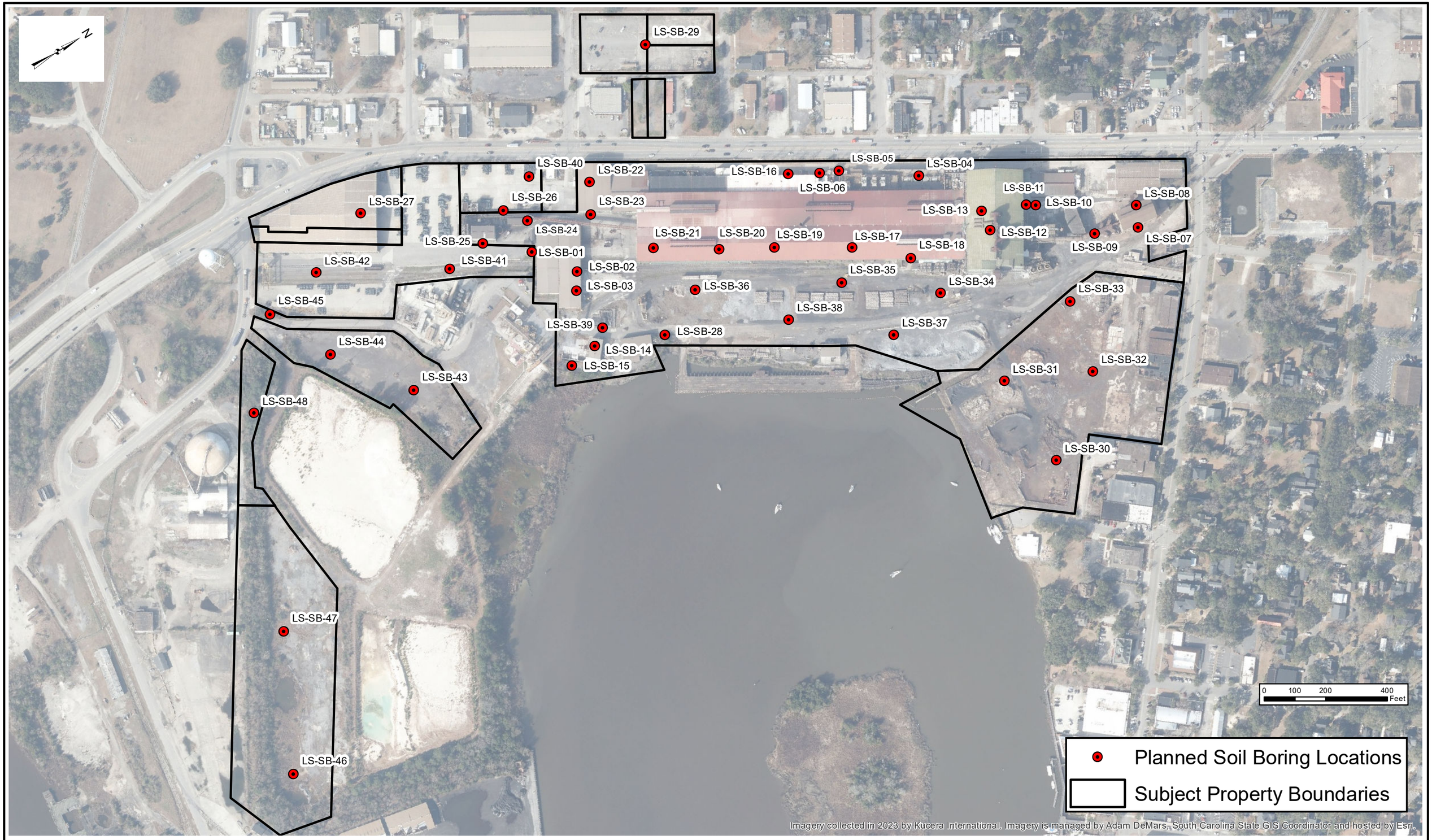
VCC 25-8848-NRP

MAP OF AREAS OF CONCERN AND RECS

PROJECT: RVDE00425 | DATE: JANUARY 20, 2025 | FIGURE 3



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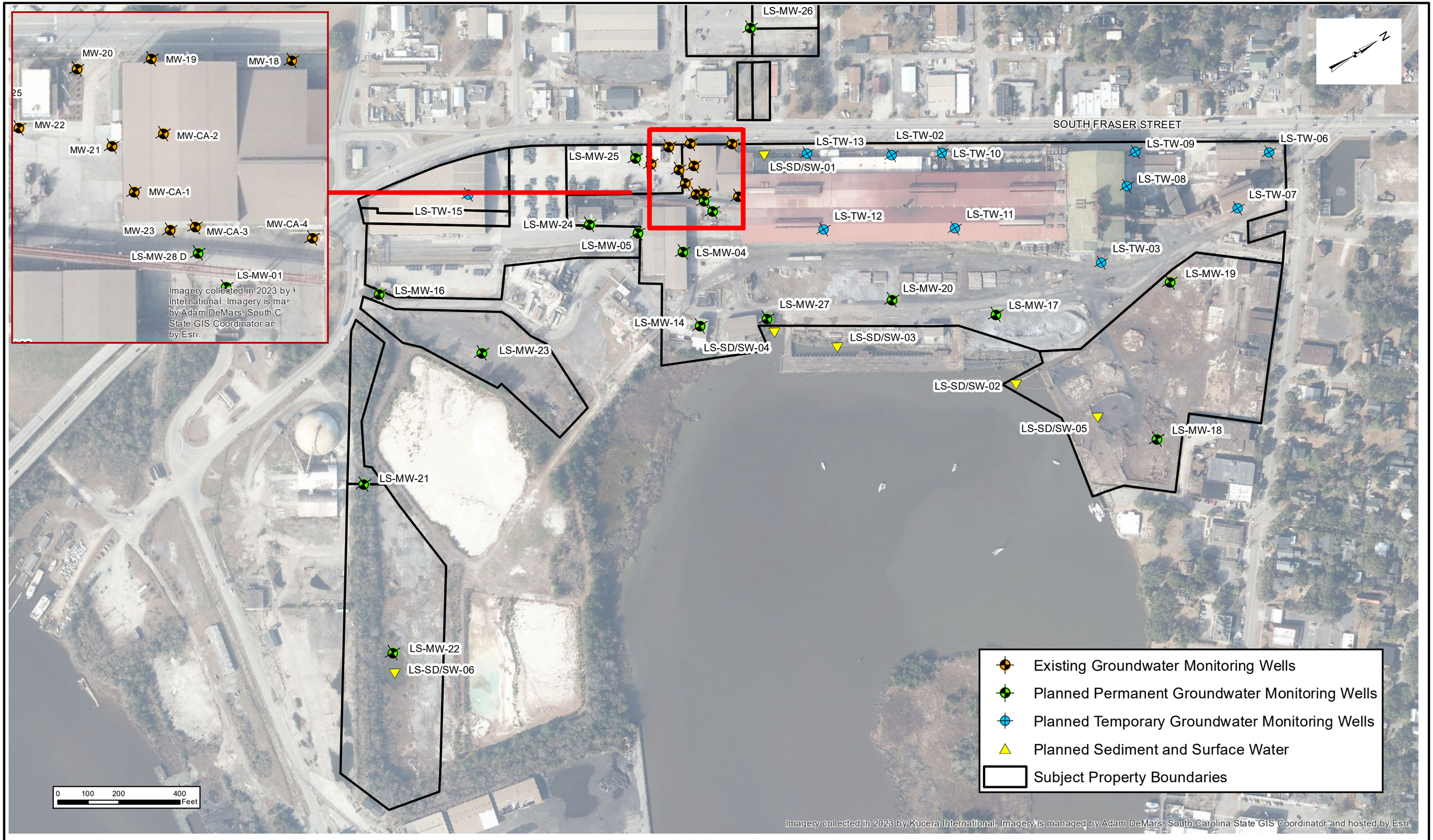
VCC 25-8848-NRP

PLANNED SOIL SAMPLE LOCATIONS

PROJECT: RVDE00425 | DATE: FEBRUARY 3, 2026 | FIGURE 4



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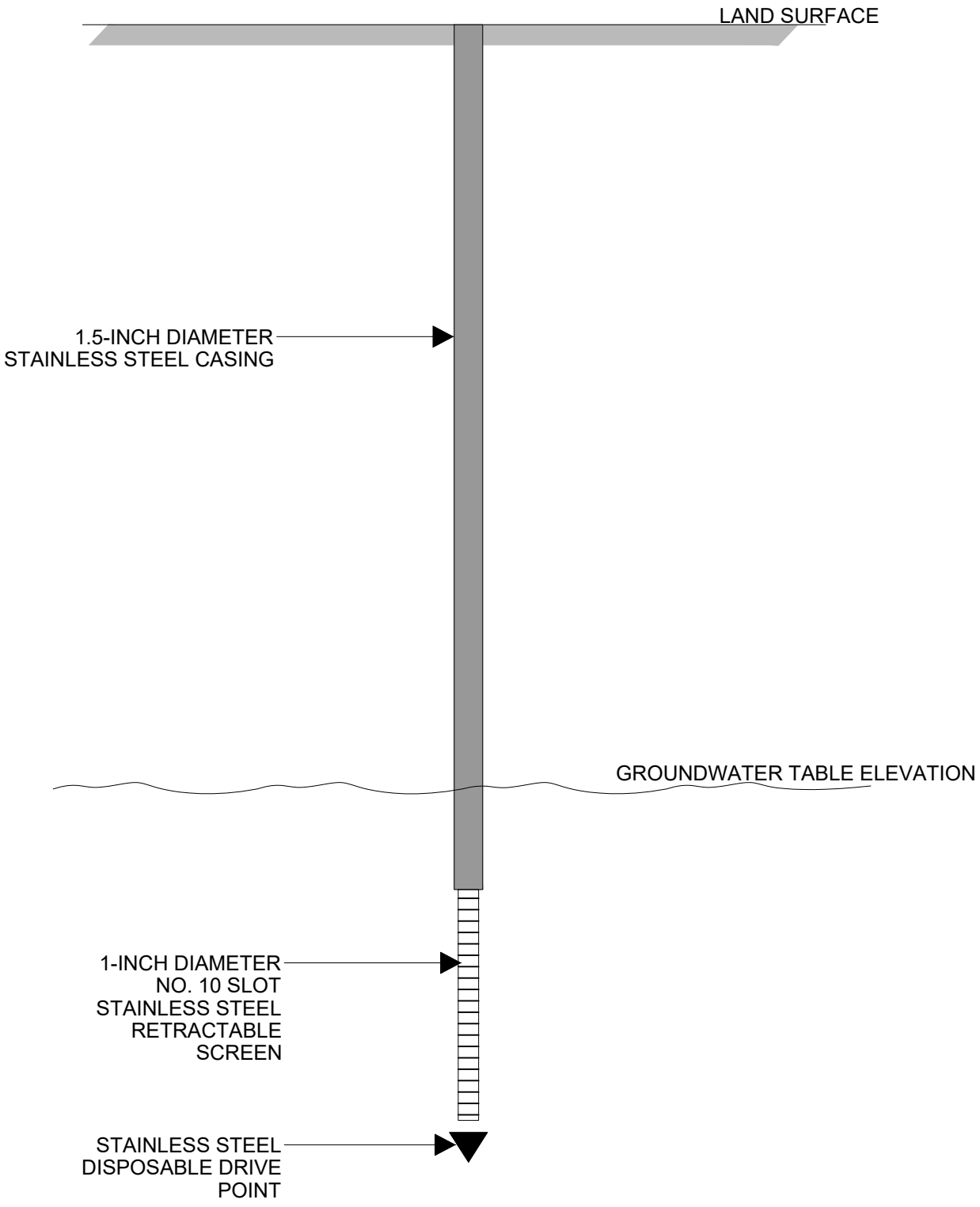
PLANNED GROUNDWATER, SURFACE WATER, AND SEDIMENT SAMPLE LOCATIONS

PROJECT: RVDE00425 | DATE: FEBRUARY 3, 2026 | FIGURE 5



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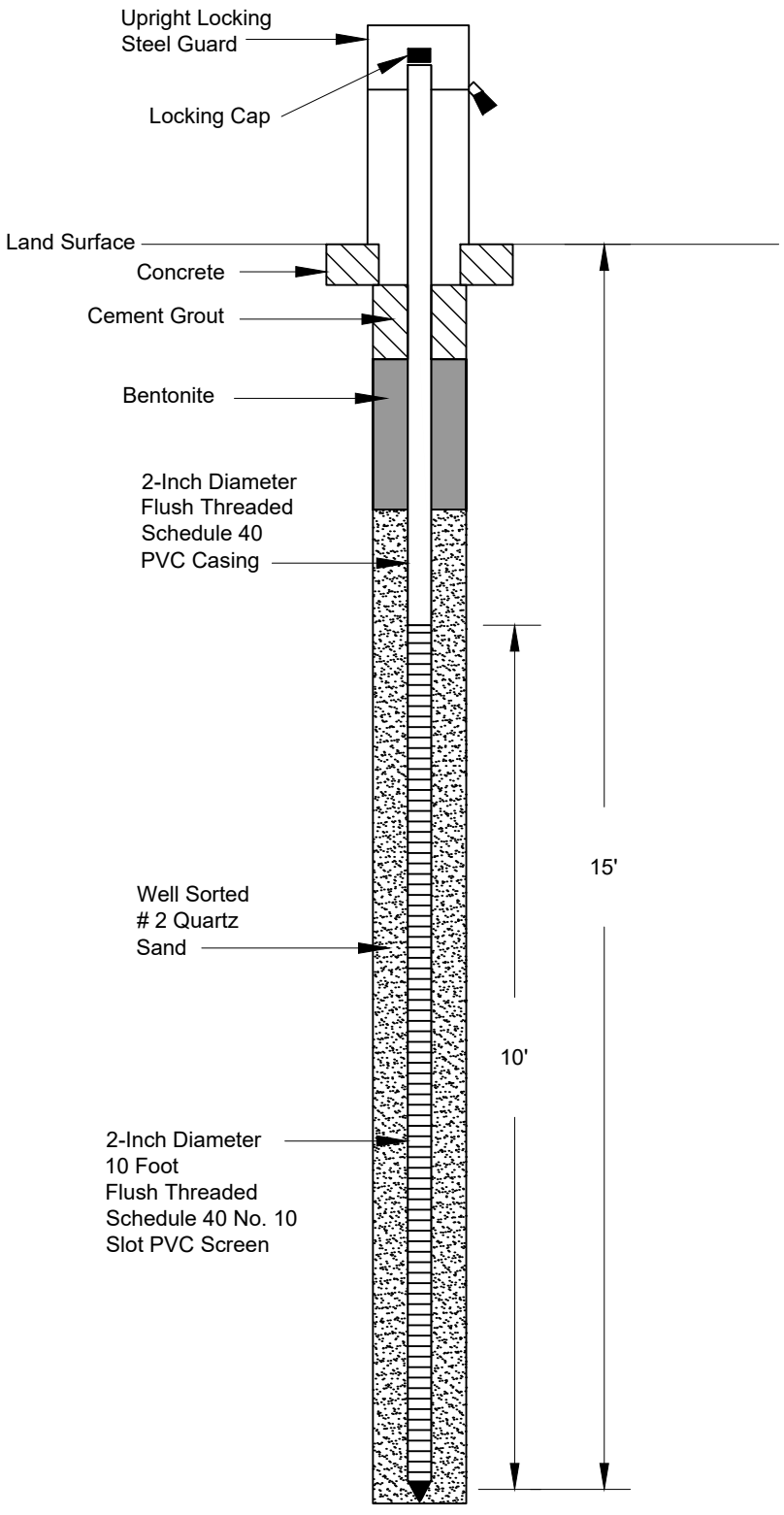
PROJECT: rvde00425			
VOLUNTARY CLEANUP CONTRACT BASELINE SITE ASSESSMENT WORK PLAN LIBERTY STEEL PROPERTY GEORGETOWN, SOUTH CAROLINA VCC 25-8848-NRP	DIRECT PUSH TECHNOLOGY TEMPORARY GROUNDWATER SAMPLING POINT SCHEMATIC		FIGURE 6
DATE: 01/22/2026	DRAWN BY: TJP	APPRV. BY: TRP	



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PROJECT: rvde00425			
VOLUNTARY CLEANUP CONTRACT BASELINE SITE ASSESSMENT WORK PLAN LIBERTY STEEL PROPERTY GEORGETOWN, SOUTH CAROLINA VCC 25-8848-NRP	GENERALIZED PERMANENT MONITORING WELL SCHEMATIC		FIGURE 7
DATE: 01/22/2026	DRAWN BY: TJP	APPRV. BY: TRP	

TABLES

TABLE 1. SUMMARY OF SAMPLES AND ANALYTICAL PARAMETERS

Voluntary Cleanup Contract Baseline Site Assessment Work Plan

VCC 25-8848-NRP

Liberty Steel Property

Georgetown, South Carolina

LOCATION ID/QUALITY CONTROL SAMPLE TYPE	SAMPLE LOCATION OR RATIONALE	SAMPLE TYPE	Number of Analyses									
			TCL VOCs*	TCL SVOCs	TAL Metals	Hexavalent Chromium	Dissolved TAL Metals	Dissolved Hexavalent Chromium	TCL PCBs	TCL Pest-icides	Cyanide	PFAS
SOIL /SEDIMENT												
LS-SB-01	Waste oil storage area adjacent to the mobile equipment shop	Surface and Subsurface Soil	1	2	2	2						
LS-SB-02	Mobile equipment shop, one near the location of the service pit	Surface and Subsurface Soil	1	2	2	2						
LS-SB-03		Surface and Subsurface Soil	1	2	2	2						
LS-SB-04	Western edge of the rolling mill -near substation	Surface and Subsurface Soil	1	2	2	2			2	2	2	
LS-SB-05	Western edge of rolling mill - near fuel oil ASTs	Surface and Subsurface Soil	1	2	2	2						
LS-SB-06	Western Edge of the rolling mill -near the sump and covered subgrade structure adjacent to the fuel oil ASTs	Surface and Subsurface Soil	1	2	2	2						
LS-SB-07	Baghouse and associated piping	Surface and Subsurface Soil	1	2	2	2						
LS-SB-08		Surface and Subsurface Soil	1	2	2	2						
LS-SB-09		Surface and Subsurface Soil	1	2	2	2						
LS-SB-10	Lime silo and associated sump	Surface and Subsurface Soil	1	2	2	2						
LS-SB-11		Surface and Subsurface Soil	1	2	2	2						
LS-SB-12	EAF and Ladle Furnace area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-13		Surface and Subsurface Soil	1	2	2	2						
LS-SB-14	Mold repair shop, one near the sump located behind the containment structure and one near the sump beneath work area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-15		Surface and Subsurface Soil	1	2	2	2						
LS-SB-16	Western edge of the rolling mill near the transformer vault	Surface and Subsurface Soil	1	2	2	2			2	2	2	
LS-SB-17	Rolling mill, with a preference for locations near the subgrade pit, scale pit, and Morgan oil cellar	Surface and Subsurface Soil	1	2	2	2			2	2	2	
LS-SB-18		Surface and Subsurface Soil	1	2	2	2						
LS-SB-19		Surface and Subsurface Soil	1	2	2	2						
LS-SB-20		Surface and Subsurface Soil	1	2	2	2						
LS-SB-21		Surface and Subsurface Soil	1	2	2	2						
LS-SB-22	Coil compactor area, one located proximal to MW-23	Surface and Subsurface Soil	1	2	2	2						
LS-SB-23		Surface and Subsurface Soil	1	2	2	2						
LS-SB-24	WWTP and adjacent scale pit, crack in the sludge drying bed.	Surface and Subsurface Soil	1	2	2	2						
LS-SB-25		Surface and Subsurface Soil	1	2	2	2			2	2	2	
LS-SB-26		Surface and Subsurface Soil	1	2	2	2						
LS-SB-27	Former Riverside Oil Company building	Surface and Subsurface Soil	1	2	2	2						
LS-SB-28	Gasoline AST with underground piping	Surface and Subsurface Soil	1	2	2	2						
LS-SB-29	Presumed background location	Surface and Subsurface Soil	1	2	2	2						
LS-SB-30	Former DRI plant area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-31		Surface and Subsurface Soil	1	2	2	2						
LS-SB-32		Surface and Subsurface Soil	1	2	2	2						
LS-SB-33		Surface and Subsurface Soil	1	2	2	2						
LS-SB-34	Scrap, scale, and slag storage area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-35		Surface and Subsurface Soil	1	2	2	2						
LS-SB-36		Surface and Subsurface Soil	1	2	2	2			2	2	2	
LS-SB-37		Surface and Subsurface Soil	1	2	2	2						
LS-SB-38		Surface and Subsurface Soil	1	2	2	2						
LS-SB-39	Sludge mixing pad to the northwest of the mold repair shop	Surface and Subsurface Soil	1	2	2	2						
LS-SB-40	Former Atlantic Coast Lumber maintenance shop	Surface and Subsurface Soil	1	2	2	2						
LS-SB-41	Rail spur on the southern portion of the Property	Surface and Subsurface Soil	1	2	2	2						
LS-SB-42		Surface and Subsurface Soil	1	2	2	2						
LS-SB-43	Former coil storage area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-44		Surface and Subsurface Soil	1	2	2	2						
LS-SB-45	Truck wash area	Surface and Subsurface Soil	1	2	2	2						
LS-SB-46	Southernmost Parcel	Surface and Subsurface Soil	1	2	2	2						
LS-SB-47		Surface and Subsurface Soil	1	2	2	2						
LS-SB-48		Surface and Subsurface Soil	1	2	2	2						
Field Duplicates	10 Percent of Soil Samples	Surface and Subsurface Soil	10	10	10	10			1	1	1	
LS-SD-01	Drum storage area near coil compactor	Sediment	1	1	1	1						
LS-SD-02	Downstream accesible point on storm drain or effluent discharge pipes	Sediment	1	1	1	1						
LS-SD-03		Sediment	1	1	1	1						
LS-SD-04		Sediment	1	1	1	1						
LS-SD-05	Downgradient area near former DRI plant	Sediment	1	1	1	1						
LS-SD-06	Bermed ponded area on southernmost parcel	Sediment	1	1	1	1						
Field Duplicate	10 percent of Sediment Samples	Sediment	1	1	1	1						

TABLE 1. SUMMARY OF SAMPLES AND ANALYTICAL PARAMETERS

Voluntary Cleanup Contract Baseline Site Assessment Work Plan

VCC 25-8848-NRP

Liberty Steel Property

Georgetown, South Carolina

LOCATION ID/QUALITY CONTROL SAMPLE TYPE	SAMPLE LOCATION OR RATIONALE	SAMPLE TYPE	Number of Analyses									
			TCL VOCs*	TCL SVOCs	TAL Metals	Hexavalent Chromium	Dissolved TAL Metals	Dissolved Hexavalent Chromium	TCL PCBs	TCL Pest-icides	Cyanide	PFAS
GROUNDWATER/SURFACE WATER												
LS-MW-01	Downgradient of coil compactor area	Groundwater	1	1	1	1	1	1				
LS-TW-02	Near transformer vault- west edge of rolling mill - along Fraser Street	Groundwater	1	1	1	1	1	1	1	1	1	
LS-TW-03	Downgradient of EAF and Ladle Furnace Area	Groundwater	1	1	1	1	1	1				
LS-MW-04	Near service pit in mobile equipment shop	Groundwater	1	1	1	1	1	1	1	1	1	
LS-MW-05	Near waste oil storage area - south side of mobile equipment shop	Groundwater	1	1	1	1	1	1				
LS-TW-06	Northwest boundary of Property	Groundwater	1	1	1	1	1	1				
LS-TW-07	Near baghouse	Groundwater	1	1	1	1	1	1				
LS-TW-08	Near lime silo sump	Groundwater	1	1	1	1	1	1				
LS-TW-09	Northwest boundary of Property	Groundwater	1	1	1	1	1	1				
LS-TW-10	Near fuel oil ASTs along west edge of rolling mill - along Fraser Street	Groundwater	1	1	1	1	1	1				
LS-TW-11	Downgradient of subgrade pit in rolling mill	Groundwater	1	1	1	1	1	1				
LS-TW-12	Downgradient of Morgan oil cellar in rolling mill	Groundwater	1	1	1	1	1	1				
LS-TW-13	Near machine shop - west edge of rolling mill - along Fraser Street	Groundwater	1	1	1	1	1	1				
LS-MW-14	Near mold repair shop sump	Groundwater	1	1	1	1	1	1				
LS-TW-15	Southwest corner of Property near former Riverside Oil Company building	Groundwater	1	1	1	1	1	1				
LS-MW-16	Near truck wash area	Groundwater	1	1	1	1	1	1				
LS-MW-17	Eastern edge of Property	Groundwater	1	1	1	1	1	1				1
LS-MW-18	Former DRI plant area	Groundwater	1	1	1	1	1	1	1	1	1	
LS-MW-19		Groundwater	1	1	1	1	1	1				1
LS-MW-20	Eastern edge of Property	Groundwater	1	1	1	1	1	1				1
LS-MW-21	Southernmost Parcel	Groundwater	1	1	1	1	1	1				
LS-MW-22		Groundwater	1	1	1	1	1	1				
LS-MW-23	Former coil storage area	Groundwater	1	1	1	1	1	1				
LS-MW-24	Downgradient of WWTP	Groundwater	1	1	1	1	1	1	1	1	1	1
LS-MW-25	Near former Atlantic Coast Lumber maintenance building	Groundwater	1	1	1	1	1	1				
LS-MW-26	Presumed background location on Property west of South Fraser Street	Groundwater	1	1	1	1	1	1				
LS-MW-27	Eastern edge of Property near gasoline AST and underground piping	Groundwater	1	1	1	1	1	1				1
LS-MW-28 D	Deep well near presumed source of chlorinated VOC plume Coil Compactor Area	Groundwater	1									
MW-18	Existing Monitoring Wells - Near Coil Compactor Area	Groundwater	1	1	1	1	1	1				
MW-19		Groundwater	1	1	1	1	1	1				
MW-20		Groundwater	1	1	1	1	1	1				
MW-21		Groundwater	1	1	1	1	1	1				
MW-22		Groundwater	1	1	1	1	1	1				
MW-23		Groundwater	1	1	1	1	1	1				
MW-CA-1		Groundwater	1	1	1	1	1	1				
MW-CA-2		Groundwater	1	1	1	1	1	1				
MW-CA-3		Groundwater	1	1	1	1	1	1				
MW-CA-4		Groundwater	1	1	1	1	1	1				
Field Duplicates	10 Percent of Groundwater Samples	Groundwater	4	4	4	4	4	4				
LS-SW-01	Drum storage area near coil compactor area	Surface Water	1	1	1	1	1	1				
LS-SW-02	Downstream accesible point on storm drain or effluent discharge pipes	Surface Water	1	1	1	1	1	1				
LS-SW-03		Surface Water	1	1	1	1	1	1				
LS-SW-04		Surface Water	1	1	1	1	1	1				
LS-SW-05	Downgradient area near former DRI plant	Surface Water	1	1	1	1	1	1				
LS-SW-06	Bermed ponded area on southernmost parcel	Surface Water	1	1	1	1	1	1				
Field Duplicate	10 percent of Surface Water Samples	Surface Water	1	1	1	1	1	1				
Field Equipment Blank	Soil sampling equipment rinsate	Laboratory-provided deionized water	1	1	1	1						
Field Equipment Blank	Groundwater sampling equipment rinsate	Laboratory-provided deionized water	1	1	1	1						
Trip Blank	Assesses field and laboratory accuracy; One per shipment containing samples for VOC analysis	Laboratory-provided deionized water	1									

* VOC analyses will not be conducted on surface soil samples.

PCBs = Polychlorinated biphenyls

TAL Metals = Target Analyte List Metals

TCL = EPA Target Compound List

SVOCs = Semivolatile organic compounds

VOCs = Volatile organic compounds

PFAS = Perfluorinated Alkyl Acids

Dissolved metals analysis conducted on field filtered groundwater samples.

TABLE 2. ANALYTICAL METHODS, HOLDING TIMES, CONTAINERS, AND PRESERVATION REQUIREMENTS

Voluntary Cleanup Contract Baseline Site Assessment Work Plan

VCC 25-8848-NRP

Liberty Steel Property

Georgetown, South Carolina

Analytical Parameter	Analytical Method	Extraction Holding Time	Analysis Holding Time	Container Type	Container Volume	Sample Preservative
SOIL / SEDIMENT						
TCL VOCs	SW846 8260B	48 hours to freeze	14 days	G	40 mL (4)	DI H_2O (2), Methanol (1), None (1); Chilled*
TCL SVOCs	SW846 8270D	14 days	40 days	G	8 oz	Chilled*
TCL PCBs TCL Pesticides	SW846 8082A SW846 8081B	1 year 14 days	40 days	G	8 oz	Chilled*
TAL Metals Mercury	SW846 6010D SW846 7471B	6 months 28 days	6 months 28 days	P	8 oz	Chilled*
Hexavalent Chromium	SW846 7196A SW846 3060A	30 days to digestion	7 days digestion to analysis	P, G	4 oz.	Chilled*
Cyanide	SW846 9012B	14 days		G or P	8 oz	Chilled*
GROUNDWATER / SURFACE WATER / BLANKS						
TCL VOCs	SW846 8260B	NA	14 days	G, vials	40 mL (3)	Chilled*, HCl (pH<2)
TCL SVOCs	SW846 8270D	7 days	40 days	G, amber	1000 mL (2)	Chilled*
TCL PCBs	SW846 8082A	1 year	40 days	G, amber	1000 mL (2)**	Chilled*
TCL Pesticides	SW846 8081B	7 days	40 days	G, amber	1000 mL (2)**	Chilled*
Total/Dissolved TAL Metals Mercury	SW846 6010D SW846 7470A	6 months 28 days	6 months 28 days	P	500 mL	(Filtered/Unfiltered) HNO_3 (pH<2)
Total/Dissolved Hexavalent Chromium	SW846 7196A	24 Hours or 28 days when field filtered prior to preservative additions		P, G	125 ml	$(NH_4)_2SO_4$, pH = 9.3-9.7, Chilled*
Cyanide	SW846 9012B	14 days		G or P	250 ml	Chilled*, NaOH (pH>12)
PFAS	EPA 1633	28 days for extraction, 90 days after extraction for analysis		HDPE	2- 500 mL + screening vial	Chilled*

NOTES:

DI H_2O = deionized water

HCl = hydrochloric acid

HNO_3 = nitric acid

NaOH = sodium hydroxide

PCBs = Polychlorinated biphenyls

VOCs = volatile organic compounds

SVOCs = semivolatile organic compounds

TAL Metals = Target Analyte List Metals, excluding cyanide

\S = Perfluorinated Alkyl Acids

L = liters

mL = milliliters

oz = ounces

P = plastic

G = glass

HDPE - high density polyethylene

* Upon sample collection, samples will be maintained in a cooler with sufficient coolant to chill the samples to less than 6 °C until received by the analytical laboratory. While in the laboratory, samples will be stored and maintained between 0.1 and 4.4 °C.