57992

Itron

SCANNED

October 20, 2017

Ms. Regan Rahn
Project Manager
Bureau of Land and Waste Management
S.C. Department of Health and Environmental Control (SCDHEC)
2600 Bull Street
Columbia, SC 29201

Re: Feasibility Study (FS) Work Plan for Greenwood Site (RPVCC #13-6078-RP)
1310 Emerald Road
Greenwood, South Carolina 29646

Dear Ms. Rahn:

Enclosed are two (2) copies of the Feasibility Study (FS) Work Plan for the above referenced site prepared by Itron's Consultant – AECOM. An e-copy was sent to you earlier today.

If you have any question, do not hesitate to contact me at 510-844-2882 or email me at Pad.Kemmanahalli@itron.com

Sincerely,

Pad Kemmanahalli
Corporate Senior Director, Global HSE & Sustainability

Enclosures: 2 Copies of Feasibility Study (FS) Work Plan

RECEIVED
OCT 23 2017
SITE ASSESSMENT, REMEDIATION & REVITALIZATION

ITRON
1111 Broadway, Suite 1800
Oakland, CA 94607
www.itron.com

47

Feasibility Study (FS) Work Plan for
Itron Inc.
1310 Emerald Road
Greenwood, South Carolina
RPVCC 13-6078-Rp (October 20, 2017)

Executive Summary

- Discuss remedial action objectives/end point of Voluntary Cleanup Contract and transition to an Amendment for Remedy

Section 1: Introduction

- Feasibility Study Objectives
- Report Organization

Section 2: Site Background

- Site Description, location and setting
- General and Site-Specific Geology
- General and Site-Specific Hydrogeology
- Site Surface Water Hydrology
- Summary of Nature and Extent of Contamination
- Summary of Fate and Transport

Section 3: Identification of Remedial Action Objectives and Remedial Goals

- Identify Constituents of Concern (COCs) and media
- Remedial Action Objectives
    - Restore groundwater concentrations to applicable remediation goals
    - Prevent exposure of ecological receptors to impacted soil and groundwater above applicable standards.
- Remedial Goals
    - Establish remedial goals for groundwater based on applicable standards for site-specific constituents.

Section 4: Screening of Technologies and Identification of Remedial Action Alternatives

- No Action
- Institutional Controls
- Monitored Natural Attenuation
- Excavation and Disposal
- Groundwater Extraction and Treatment by Air Stripping

- Air Sparging and SVE
- Enhanced Reductive Dechlorination (Bioremediation - HRC)
- In Situ Remediation using BOS 100®
- In Situ Chemical Oxidation (ISCO)
- Electrical Resistance Heating

Section 5: Description and Detailed Analysis of Remedial Alternatives

- Evaluation Criteria
  - Protective of human health and environment
  - Compliance with applicable or relevant and appropriate requirements (ARARs)
  - Long-Term Effectiveness and Permanence
  - Reduction of toxicity, mobility or volume through treatment
  - Short-term effectiveness
  - Implementability
  - Cost – Qualitative (high, intermediate, low)

Section 6: Comparative Evaluation of Remedial Alternatives with Effectiveness and Costs

Section 7: References

Tables

- Current Summary of soil analytical results
- Current Summary of groundwater analytical results
- Cost Estimate Summary for each Alternative
- Comparative Analysis of each Alternative, ranking from best to worst

Figures

- Topographic Map
- Site Map
- Cross Section Location Map and Cross Sections
- Groundwater Elevation Contour Maps
- Soil Concentration Maps (PCE)
- Groundwater Concentration Maps (PCE and various ancillary VOCs)