



AECOM
3820 Faber Place, Suite 300
Charleston, SC 29405

843.740.7301 tel
843.740.7995 fax

August 6, 2014

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

**Re: Work Plan for Additional Groundwater Sampling
Shakespeare Composite Structures
19845 US Highway 76
Newberry, SC
Site ID # 51025**

Dear Ms. Walker:

AECOM Technical Services, Inc. (AECOM) was retained by Shakespeare Composite Structures (Shakespeare) to perform a subsurface investigation effort at their facility located in Newberry, South Carolina ("Site," **Figure 1**). This additional round of investigation is being performed as a follow-up to previous on-site efforts that detected the presence of chlorinated volatile organic compounds (CVOCs) in shallow groundwater beneath the site. The latest round of investigative work was initiated in mid-July 2014 and included the installation of several deep bedrock wells and collection of shallow groundwater samples from several locations on private properties to the north and west of the Shakespeare facility. Based on the results of the off-site sampling, Shakespeare would like to collect samples from additional offsite locations to define the horizontal extent of CVOCs.

This document serves as a work plan describing the activities planned for this additional groundwater investigation effort. A brief description of the proposed scope of work for this effort is included below. We would also like to request that well permit # 09706 issued by the South Carolina Department of Health and Environmental Control (SCDHEC) on July 10, 2014 be modified to include the proposed temporary well installation effort described herein.

Scope of Work

This investigative effort will entail the installation of approximately seven additional temporary shallow groundwater monitoring points to allow the delineation of elevated CVOC concentrations on properties to the north and west of the Shakespeare facility. The proposed locations for the shallow sample points are depicted on **Figure 2**. In addition to the proposed shallow sampling effort, due to the determination that competent bedrock lies much deeper beneath the site than originally anticipated, Shakespeare will also assess groundwater quality within the depth interval between the bottom of the existing shallow well

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network (approximately 25 feet) and the top of the competent rock (approximately 75 feet) using temporary monitoring points.

Temporary Well Point Installation

The intent of the temporary monitoring points is to allow collection of samples that will provide of “snapshot” of groundwater quality at the proposed locations. To accomplish this a Geoprobe™ 7822 or 8040 drill rig and a screen point sampler will be utilized to collect groundwater samples. The screen point sampling device is approximately 1.5 inches in diameter and approximately three feet long. It has an outer casing that surrounds a stainless steel, wire wrapped screen. Once the sampler is driven to a desired depth, the outer casing is pulled up (back-pulled), exposing the inner screen to the subsurface. Groundwater samples can be collected from the screened interval using dedicated, disposable Teflon tubing and a peristaltic pump.

Groundwater samples will be collected from each proposed shallow location and screened on site for total CVOCs using the Color Tec screening kit. Should the results of field screening at a location determine CVOCs are present the off-site shallow groundwater sampling grid will be expanded horizontally until the field screening does not detect CVOCs in a sample.

Field screening will also be utilized to vertically profile the presence of CVOCs in intermediate groundwater beneath the Site. The screen point sampler will be used to collect samples starting between 30 to 35 feet below land surface for field screening. Should screening indicate the presence of CVOCs in the intermediate groundwater, additional samples will be collected at increasing depths until the field screening indicates CVOCs are not present or until vertical sampling efforts are stopped due to the presence of competent rock.

Groundwater Sampling and Field Screening Procedures

Once the screen point sampler is exposed to the desired depth interval, a section of dedicated disposable Teflon lined tubing will be lowered into the screen. The tubing will be connected to a peristaltic pump at land surface. Groundwater will be purged from the screen interval, collected in a disposable, unpreserved 40 ml glass vial. The unpreserved vial will be used in the Color Tec screening effort as discussed above. Once the field screening sample is collected, AECOM will attempt to purge and measure standard field parameters including pH, Specific Conductance and temperature. Well point sampling and purging efforts will be documented on groundwater sampling forms for inclusion with a future report to the SCDHEC.

Each of the groundwater monitoring points wells will be installed in accordance with procedures described in the Site Investigation Work Plan, dated April 2014 and/or the United States Environmental Protection Agency Guidance for Design and Installation of Monitoring Wells (dated February 2008). Once a groundwater sample has been collected from an interval, the borehole can be grouted through the device as it is being removed from the subsurface. A South Carolina Certified Well Driller will be utilized to perform all well installation and abandonment procedures.

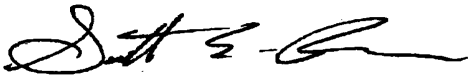
Sample Analysis

As indicated above, groundwater samples collected from each temporary well point will be screened on-site using the Color Tec screening procedure. The Color Tec field screening procedure will be performed in accordance with the standard operating procedure included in the Site Investigation Work Plan, dated April 2014. In addition, groundwater samples will be collected from approximately 20% of the temporary well points for laboratory analysis. The groundwater samples designated for laboratory analysis will be delivered to an SCDHEC certified laboratory as soon after collection as possible. Each of these samples

will be analyzed for Target Compound List Volatile Organic Compounds (TCL VOCs). Appropriate chain of custody, sample preservation, shipping, and analytical procedures will be performed in accordance with applicable USEPA SW-846 methodologies.

AECOM would like to initiate the drilling activities associated with this project on Monday August 11, 2014. We appreciate your assistance with review of this work plan. Should you have any questions regarding this request, please contact Scott Ross at (803)201-9662.

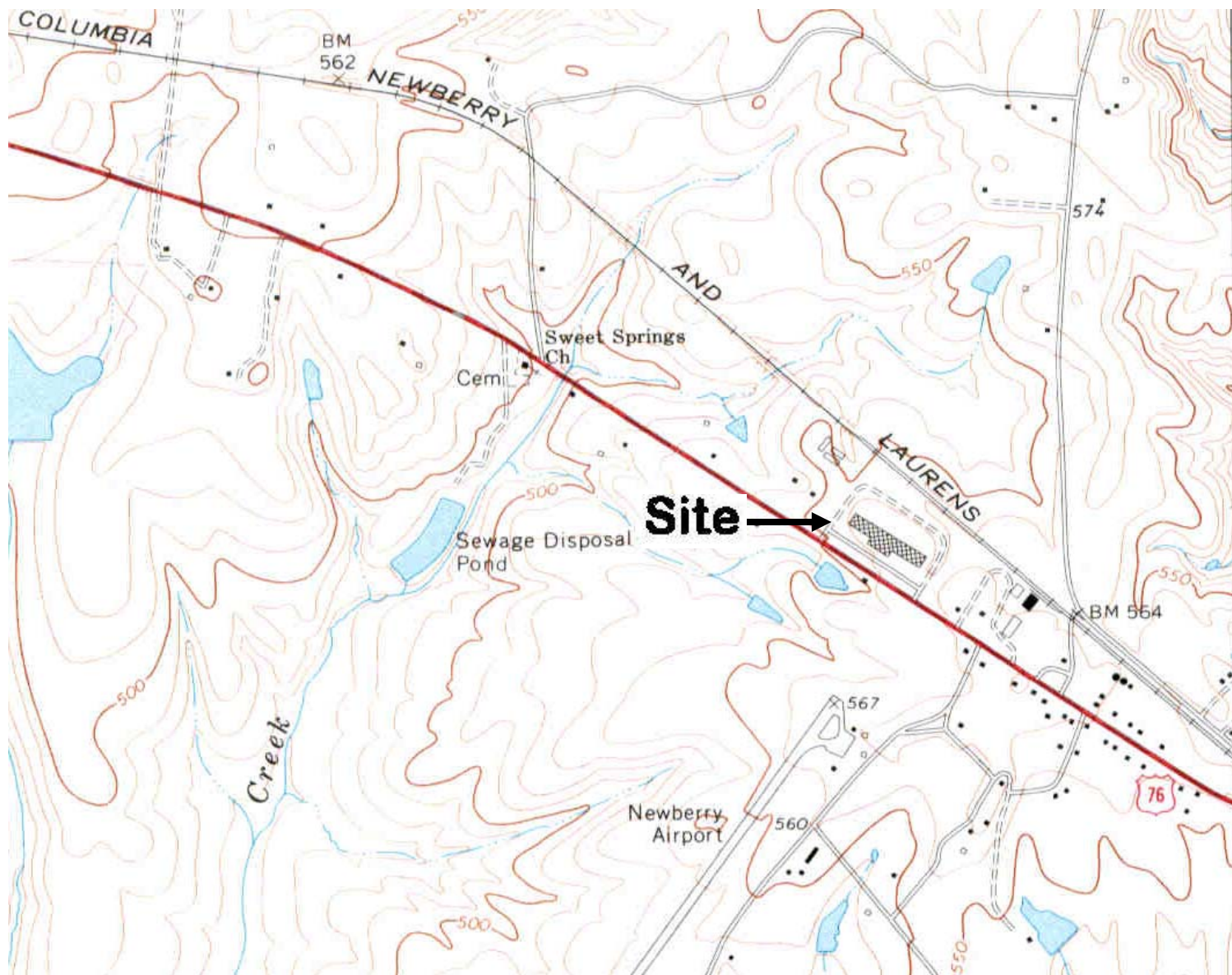
Sincerely,

A handwritten signature in black ink, appearing to read "Scott E. Ross".

Scott E. Ross, P.G.
Senior Project Manager

cc: Mr. Mike Senn - Shakespeare
Mr. Jay Smith - Philips

FIGURES



Modified from: USGS, Newberry West Quadrangle, 1969



Figure 1
Site Location
Shakespeare Composite Structures,
LLC, Newberry, SC

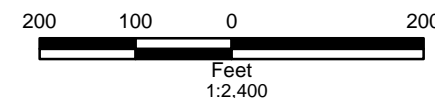
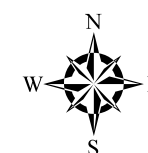


Legend

- Permanent Monitoring Well Location
- Shallow temporary well
- Bedrock well
- Proposed locations for collection of additional shallow and/or intermediate samples
- ⊕ Temporary Monitoring Well Location
- ⊕ Temporary Monitoring Well Replaced by Permanent Monitoring Well

Map Projection:
 NAD 83
 South Carolina State Plane, Feet
 Fips3900

Datum:
 North American 1983



10 Patewood Drive, Building 6, Suite 500
 Greenville, SC 29615
 T: (864) 234-3000 F: (864)234-3069

**Permanent Monitoring Well and
 Temporary Monitoring Well Locations**

Shakespeare Composite Structures
 Newberry, South Carolina

PROJECT NO. 60164311	PREPARED BY: RJS	DATE: 6/17/2014	Figure 2
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