



May 12, 2026

Certified Mail

Article #: 92148969009997901428110262

Mr. Richard Scherer, Esq.
C/O Lippes Mathias
Gibraltar Industries, Inc.
50 Fountain Plaza, Suite 1700
Buffalo, NY 14202

RE: Amendment to Voluntary Cleanup Contract 14-6226-RP
Bluewater Thermal Solutions Site
Laurens County
File # 305608

Dear Mr. Scherer:

Please find enclosed a Certified as True and Correct Copy of the Amendment to Voluntary Cleanup Contract 14-6226-RP which was executed by the South Carolina Department of Environmental Services (SCDES) on May 7, 2026.

Thank you for your patience and cooperation in this matter. SCDES continues to look forward to working with Bodycote Thermal Processing, Inc. and Gibraltar Industries, Inc. to address this Site under the State Voluntary Cleanup Program. Should you wish to further discuss the terms of the Amendment, please contact Lucas Berresford at (803) 898-0747.

Sincerely,

A handwritten signature in black ink that reads "Elisa Vincent".

Elisa Vincent, Contract Coordinator
State Voluntary Cleanup Program
Division of Site Assessment, Remediation, and Revitalization

CC: R. Gary Stewart, BLWM (w/enclosure)
J. Lucas Berresford, BLWM (w/enclosure)
Gen Keller-Milliken/Shawn Reed/Linda Jackson, BLWM (w/enclosure)
Natalie Kirkpatrick, BRLS (w/enclosure)
File # 305608

**FIRST AMENDMENT TO VOLUNTARY CLEANUP CONTRACT
14-6226-RP**

**IN THE MATTER OF
BLUEWATER THERMAL SOLUTIONS SITE,
LAURENS COUNTY
AND
BODYCOTE THERMAL PROCESSING, INC. AND
GIBRALTAR INDUSTRIES, INC.**

WHEREAS, on May 27, 2015, Bodycote Thermal Processing, Inc. and Gibraltar Industries, Inc. (collectively, Respondents) and the South Carolina Department of Health and Environmental Control¹ entered into Voluntary Cleanup Contract 14-6226-RP (VCC), with respect to the Bluewater Thermal Solutions Site located at 100 Hunts Bridge Road, Fountain Inn, South Carolina (Site).

WHEREAS, the VCC provides that Respondents submit for approval a Feasibility Study (FS) to evaluate remedial alternatives and potential risks to human health that may be posed by existing contamination at the Site;

WHEREAS, Respondents submitted the Revised Feasibility Study (FS) on March 16, 2022.

¹ Pursuant to South Carolina Act No. 60 of 2023 and S.C. Code Ann. § 1-30-140, all functions, powers, and duties of the environmental divisions, office, and programs of the South Carolina Department of Health and Environmental Control were transferred to, incorporated in, and shall be administered as part of the South Carolina Department of Environmental Services (SCDES) as of July 1, 2024.

WHEREAS, the Revised Feasibility Study (FS) included results from a pilot in situ chemical oxidation (Pilot ISCO) treatment completed by Respondents in January 2019 as proposed in the October 2018 Bench Scale Study Report and approved by SCDES in a letter dated November 16, 2018;

WHEREAS, the results of the Pilot ISCO showed a significant reduction in the groundwater concentrations of tetrachloroethylene (PCE) and trichloroethylene (TCE);

WHEREAS, the Revised FS was approved by SCDES on June 9, 2022;

WHEREAS, the SCDES issued a Proposed Plan on July 25, 2023, and had a public comment period open from July 25, 2023 until September 25, 2023; and

WHEREAS, on June 26, 2024, SCDES signed a Record of Decision (ROD) for the Site. The ROD included SCDES's selected remedy for the contaminated soil and groundwater at the Site.

NOW, THEREFORE, IT IS AGREED that VCC 14-6226-RP shall be amended as follows:

(1) The ROD is incorporated by reference and shall be added as a part of the VCC.

(2) The following requirements shall be added:

- a. Within thirty (30) days of execution of this Amendment to the VCC, Respondents shall submit to SCDES for approval the RD/RA Work Plan for Alternative 3 of the ROD which includes treating groundwater using in-situ chemical oxidation at the Site. The RD/RA Work Plan shall include a groundwater sampling plan to provide information to assess the current conditions of groundwater quality at the site. The RD/RA Work Plan shall provide that in the event the current groundwater conditions meet the remedial goals as outlined in the ROD, then Respondents shall not be required to complete additional treatment of groundwater and Respondents shall be required to

- prepare a Long-Term Monitoring Plan (see Section f). In the event the current conditions of groundwater quality indicate additional treatment is required (beyond what was already completed as part of the Pilot ISCO) then the RD/RA Work Plan will include: (1) final design plans and specifications; (2) construction quality assurance requirements and procedures; (3) schedule for implementation and completion of the Remedial Action; (4) methods for satisfying permitting requirements; (5) contingency measures and their implementation; and (6) standard performance criteria and proposed actions should the criteria not be met;
- b. SCDES will review the RD/RA Work Plan and notify Respondents in writing of any deficiencies in the RD/RA Work Plan prior to approval;
 - c. Any comments generated through the review of the RD/RA Work Plan by SCDES must be addressed in writing to SCDES's Project Manager within thirty (30) days of receipt of said comments by Respondents;
 - d. Upon approval of the RD/RA Work Plan by SCDES (and the time schedule for implementation thereof), the RD/RA Work Plan and schedule shall be incorporated herein and become an enforceable part of the VCC;
 - e. Respondents shall (pending site access) begin to implement the steps set forth in the RDA/RA Work Plan within thirty (30) days of the approval of the RD/RA Work Plan by SCDES and thereafter take all necessary and reasonable steps to ensure timely completion of the remedy;
 - f. Within sixty (60) days after the earlier of (i) SCDES approval that no additional treatment is required (beyond what was already completed as part of the Pilot ISCO); or (ii) the completion any necessary additional treatment, a Long-Term Monitoring

(LTM) Plan will be prepared by Respondents and submitted to SCDES for review. Any comments generated through the review of the LTM Plan by SCDES will be addressed in writing to SCDES's Project Manager within thirty (30) days of receipt of said comments by Respondents;

- g. Within sixty (60) days of the completion of all remedial activities approved in the RD/RA Work Plan, Respondents shall submit to SCDES's Project Manager a written Remedial Design/Remedial Action Report. This report shall provide a detailed description of the activities taken, including any analytical results, volumes of waste removed, manifests, etc. SCDES shall review the report for determination of completion of the remedial activities and sufficiency of the documentation within a reasonable period of time. If SCDES determines that the remedial activities are not completed in accordance with the approved RD/RA Work Plan, Respondents shall take all necessary and reasonable actions to complete the remedial measures within the time specified by SCDES. In the alternative, if the documentation contained in the Remedial Action Report as submitted by Respondents is not approved, Respondents shall submit a revised report to SCDES's Project Manager, which addresses the comments in SCDES's letter, within thirty (30) days after receipt of the SCDES's disapproval letter; and
- h. Respondents' obligation to submit quarterly progress reports pursuant to Paragraph 6 of the VCC shall be continued and may be reduced to such other frequency set forth in the LTM Plan approved by SCDES.

FURTHER IT IS AGREED that this Amendment in no way is intended to or does affect VCC 14-6226-RP except as specifically provided herein and such VCC remains in full force and effect subject to this Amendment.

FOR THE SOUTH CAROLINA DEPARTMENT
OF ENVIRONMENTAL SERVICES

Juli E. Blalock
Juli E. Blalock, Chief
Bureau of Land and Waste Management

DATE: 5/7/26

Karen Pasig
Reviewed by Office of General Counsel

DATE: 5/7/26


BODYCOTE THERMAL PROCESSING, INC.

Thomas Anderson
Signature

DATE: 3/23/2026

Thomas Anderson Environmental Manager, NA
Printed Name and Title

GIBRALTAR INDUSTRIES, INC.



Signature

DATE: 4.3.2026

Jeffrey Watorok, Treasurer

Printed Name and Title