



Westinghouse Electric Company  
Nuclear Fuel  
Columbia Fuel Fabrication Facility  
5801 Bluff Road  
Hopkins, South Carolina 29061  
USA

SCDHEC, BLWM  
Kim Kuhn  
2600 Bull Street  
Columbia, SC 29201

Direct tel: 803.647.1920  
Direct fax: 803.695.3964  
e-mail: joynerdp@westinghouse.com

Your ref:  
Our ref: LTR-RAC-20-83

October 29, 2020

Subject: Response to SCDHEC Letter dated October 14, 2020  
Phase II Work Plan *Addendum*

Mrs. Kuhn:

On September 15, 2020, Westinghouse Columbia Fuel Fabrication Facility (CFFF) submitted the **Phase II** Remedial Investigation Work Plan (LTR-RAC-20-72) to SCDHEC (the "Department"). SCDHEC approved the Work Plan on October 14, 2020, with the exception of three items. SCDHEC requested that Westinghouse submit a work plan addendum addressing these items no later than November 5, 2020.

Please find included with this submission the following items:

- Westinghouse responses to the SCDHEC letter dated October 14, 2020 (**Attachment A**)
  - Each comment made by SCDHEC is listed in italics ahead of the response provided by Westinghouse.
- *Revised Table 1*, Summary of Proposed Phase II RI Scope of Work (**Attachment B**)
- Sediment Sampling – Additional Information (**Attachment C**)
- Data Corrections, Revisions, and Clarifications (**Attachment D**)

Please contact me with any questions or concerns regarding the attached Phase II Work Plan *Addendum* documents.

Respectfully,



Diana P. Joyner  
Principal Environmental Engineer  
Westinghouse Electric Company, CFFF  
803.497.7062 (m)

cc: J. Ferguson, EH&S Manager  
N. Parr, Environmental Manager  
J. Grant, AECOM Project Manager  
ENOVIA Records

Enc.: **Attachment A:** Westinghouse responses to the SCDHEC letter dated October 14, 2020  
**Attachment B:** *Revised Table 1*, Summary of Proposed Phase II RI Scope of Work  
**Attachment C:** Sediment Sampling -Additional Information  
**Attachment D:** Data Corrections, Revisions, and Clarifications

## **Attachment A: Westinghouse responses to the SCDHEC letter dated October 14, 2020**

---

### **Comment 1**

*Section 3.1. Please specify how many sampling locations and the size of offset grid in the secondary soil gas survey (SGS) area. The Department agrees to meet with Westinghouse once the SGS results are received to determine the soil sampling locations.*

### **Response**

The secondary soil gas survey area (SGS) uses the same 75-foot offset grid as the primary SGS area and consists of 40 sample locations.

### **Comment 2**

*Section 3.2. In assessing the chlorinated volatile organic compounds (CVOCs) source areas the soil samples will have continuous soil cores that will be collected in approximately four (4) ft intervals to the depth of the seasonal high-water table in each soil gas survey area. Each soil sample will be composited at one (1) foot interval and measured with an organic vapor analyzer photoionization device (PID). A soil sample will be collected at the highest PID reading and from the deepest interval. The Department requests that if the PID reading remains similar throughout the boring, then samples should be collected at the deepest interval and one other interval in the boring.*

### **Response**

CFFF concurs with the Department's request to collect soil samples at the deepest interval and one other interval in a boring, should organic vapor analyzer photoionization device (PID) readings be similar throughout the boring.

### **Comment 3**

*In section 3.5. Sediment sampling will be collected at 6-inch intervals (0.0-6.0 inches, 6.0-12.0 inches) at a minimum depth of one (1) foot. Should borings yield sediments from deeper than one foot these sediments should be analyzed.*

### **Response**

CFFF concurs with the Department's request as described in Section 3.5 of the Phase II RI Work Plan: "Should more than 1 foot of sediment be recovered at a particular location, the sediment from the deeper interval(s) will also be analyzed."

## **Attachment B: Revised Table 1, Summary of Proposed Phase II RI Scope of Work**

---

Based upon multi-media analytical results from previous assessments, CFFF proposed in the Phase II RI Work Plan to remove Target Analyte List (TAL) metals and semi-volatile organic compounds (SVOCs) from the analytical list for *groundwater* sampling. In the October 14, 2020 response letter to Westinghouse, the Department concurred.

Because multi-media analytical results from previous assessments have shown that TAL metals and SVOCs are not chemicals of concern for the site, Westinghouse requests that TAL metals and SVOCs be removed from all multi-media analyses moving forward.

The Phase II RI Work Plan contained a table that summarized the proposed scope of work (**Table 1**), including the analyses by media. A *revised Table 1* is submitted with this addendum to the Phase II Work Plan, pending department approval. The revision reflects the request by Westinghouse to remove TAL metals and SVOCs from the list of analytes for all environmental media types.

**Table 1**  
**Summary of Proposed Phase II RI Scope of Work**  
**Westinghouse Columbia Fuel Fabrication Facility**  
**Hopkins, South Carolina**

COPC or Area of Interest	Data Need	Environmental Media	Assessment Activities	Analytes	Boring or Monitoring Well Reference	Figure Reference	Purpose and Rationale
CVOCs	Source area - former Oil House, Middle Ditch, W-65/66 area	Soil gas	-- Primary soil gas survey area -- Multiple soil gas sampling points -- 25 initial soil gas samples. If initial soil gas samples indicate a potential source, additional closely spaced soil gas samples to narrow area prior to confirmatory soil sampling.	CVOCs	N/A	5	Assess potential CVOC source area(s)
	Source area - former Oil House, Middle Ditch, W-65/66 area	Soil	-- Targeted DPT soil sampling if the soil gas survey indicates a potential CVOC source(s). -- Multiple interval soil sampling above the water table -- Number and location of borings to be determined	CVOCs	N/A	5	Assess potential CVOC source area(s)
	Surficial aquifer - upper zone downgradient of monitoring well W-41R	Groundwater	-- 1 permanent monitoring well -- Adjacent to the graveyard at the top of bluff -- Upper zone of the surficial aquifer	TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	W-98	6	Further delineate CVOCs in the upper zone of the surficial aquifer as it migrates towards the floodplain
	Surficial aquifer - upper zone east of monitoring well W-67	Groundwater	-- 1 or 2 DPT borings with multiple interval groundwater screening -- If CVOCs above MCL in first boring, install 1 additional soil boring east of the first boring -- Install 1 permanent monitoring well adjacent to the DPT boring with COPCs below MCL	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-20	6	Groundwater CVOC delineation east of well W-67
	Western Groundwater AOC	Groundwater	-- 4 DPT groundwater screening borings between the plant and the Western Groundwater AOC -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-25 through L-28	6 and 7	Assess whether CVOCs have migrated in groundwater from the plant area to the Western Groundwater AOC along a currently unknown preferential pathway
	Western Groundwater AOC	Soil gas	-- Secondary soil gas survey area if groundwater results do not indicate a preferential groundwater pathway from developed area of site to the Western Groundwater AOC -- Multiple soil gas sampling points -- 40 initial soil gas samples. If initial soil gas samples indicate a potential source, additional closely spaced soil gas samples to narrow area prior to confirmatory soil sampling .	CVOCs	N/A	5	Assess potential CVOC source area(s)
	Western Groundwater AOC	Soil	-- Targeted DPT soil sampling if the soil gas survey indicates a potential CVOC source(s). -- Multiple interval soil sampling above the water table -- Number and location of borings to be determined	CVOCs	N/A	5	Assess potential CVOC source area(s)
	Surficial aquifer - upgradient of wells W-65, W-66 and W-87	Groundwater	-- 4 DPT groundwater screening borings upgradient of wells W-65, W-66 and W-87 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-21 through L-24	6 and 7	Assess the upgradient extent of CVOC impact
	Surficial aquifer - lower zone sidegradient of monitoring wells W-93 and W-6	Groundwater	-- 3 DPT groundwater screening borings sidegradient of wells W-93 and W-6 -- Lower zone groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-39 through L-41	7	Delineate the eastern extent of CVOC impact.
	Surficial aquifer - lower zone downgradient of monitoring well W-48	Groundwater	-- 3 total DPT groundwater screening borings -- 2 DPT borings on USL Dike and 1 DPT boring south of LSL -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-36 through L-38	6 and 7	Delineate CVOCs in the floodplain downgradient of well W-48 and LSL
	Surficial aquifer downgradient of well W-68	Groundwater	-- 7 DPT or sonic groundwater screening borings in floodplain south of USL and well W-68 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-29 through L35	6 and 7	Delineate CVOCs in the floodplain downgradient of well W-68 and USL. Assessment of the incision into the Black Mingo confining clay observed in boring L-1 (W-95).
	Surficial aquifer - lower zone upgradient of monitoring well W-93	Groundwater	-- 1 DPT groundwater screening boring near monitoring well W-53 or W-54 -- Lower zone groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	CVOCs for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-44	7	Delineate CVOCs upgradient of monitoring well W-93.

**Table 1**  
**Summary of Proposed Phase II RI Scope of Work**  
**Westinghouse Columbia Fuel Fabrication Facility**  
**Hopkins, South Carolina**

COPC or Area of Interest	Data Need	Environmental Media	Assessment Activities	Analytes	Boring or Monitoring Well Reference	Figure Reference	Purpose and Rationale
Nitrate	Surficial aquifer - upper zone downgradient of monitoring well W-41R	Groundwater	-- 1 permanent monitoring well -- Adjacent to the graveyard at the top of bluff -- Upper zone of the surficial aquifer	TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	W-98	8	Further delineate CVOCs in the upper zone of the surficial aquifer as it migrates towards the floodplain
	Surficial aquifer - upper zone east of monitoring well W-67	Groundwater	-- 1 or 2 DPT borings with multiple interval groundwater sampling -- If nitrate is above MCL in the first boring, perform 1 additional soil boring east of the first boring -- Install 1 permanent monitoring well adjacent to the DPT boring with nitrate below MCL	Nitrate for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-20	8	Groundwater nitrate delineation east of well W-67
	Surficial aquifer downgradient of monitoring wells W-47 and W-64	Groundwater	-- 2 DPT borings on USL Dike and 1 DPT boring south of LSL -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Nitrate for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-36 through L-38	8	Delineate nitrate in the floodplain downgradient of well W-47/64 pair and LSL.
	Surficial aquifer downgradient of monitoring wells W-47 and W-64	Groundwater	-- 1 DPT or sonic groundwater screening boring in floodplain south of USL and wells W-47/64 -- Eastern-most boring from CVOC 8 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Nitrate for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-35	8	Delineate nitrate in the floodplain downgradient of well W-68 and USL
Fluoride	Surficial aquifer downgradient of monitoring wells W-47 and W-64	Groundwater	-- 3 DPT groundwater screening borings -- 2 DPT borings on USL Dike and 1 DPT boring south of LSL -- 1 DPT or sonic groundwater screening boring west of the USL Dike -- Eastern-most boring from CVOC 8 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Fluoride for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-35 through L-38	9	Delineate fluoride in the floodplain downgradient of well W-47/64 pair and LSL.
	Surficial aquifer downgradient of RI Phase I boring L-19	Groundwater	-- 1 DPT groundwater screening boring downgradient of RI Phase I boring L-19 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Fluoride for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-42	9	Delineate fluoride in the floodplain downgradient of former boring L-19 and upgradient of LSL.

**Table 1**  
**Summary of Proposed Phase II RI Scope of Work**  
**Westinghouse Columbia Fuel Fabrication Facility**  
**Hopkins, South Carolina**

COPC or Area of Interest	Data Need	Environmental Media	Assessment Activities	Analytes	Boring or Monitoring Well Reference	Figure Reference	Purpose and Rationale
Tc-99	Tc-99 potential source assessment	Soil	-- 2 soil boring locations, 1 south of the Sanitary Lagoon and 1 south of the East Lagoon -- Surface soil sampling from the 0-0.5 ft depth -- Subsurface soil sampling from 0.5-1.0 and 1.0-2.0 ft depth	Tc-99	SS-15 and SS-16	10	Evaluate if there is Tc-99 impact to surface and subsurface soil resulting from potential overtopping of the wastewater lagoons during historic precipitation events
	Surficial groundwater - lower zone adjacent to monitoring well W-11	Groundwater	-- 1 permanent surficial aquifer lower zone monitoring well -- Adjacent to well W-11 -- Five foot screen on top of the Black Mingo confining clay	TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	W-101	10	Delineate Tc-99 in the surficial aquifer - lower zone
	Surficial aquifer - lower zone sidegradient of monitoring wells W-11 and W-6	Groundwater	-- 3 DPT groundwater screening borings sidegradient of wells W-11 and W-6 -- Lower zone groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Total Tc-99 and dissolved Tc-99 for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-39 through L-41	10	Delineate the eastern extent of Tc-99 impact.
	Surficial aquifer - lower zone near monitoring well W-30	Groundwater	-- 1 DPT groundwater screening borings near wells W-30 -- Lower zone groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Total Tc-99 and dissolved Tc-99 for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-43	10	Delineate the eastern extent of Tc-99 impact.
	Surficial aquifer - downgradient of monitoring wells W-47 and W-64	Groundwater	-- 3 DPT groundwater screening borings -- 2 DPT borings on USL Dike and 1 DPT boring south of LSL -- 1 DPT or sonic groundwater screening boring west of the USL Dike -- Eastern-most boring from CVOC 8 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Total Tc-99 and dissolved Tc-99 for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-35 through L-38	10	Delineate Tc-99 in the floodplain downgradient of well W-48 and LSL
	Surficial aquifer - downgradient of monitoring well W-4	Groundwater	-- 1 DPT groundwater screening boring downgradient of well W-4 -- Multiple interval groundwater screening -- Evaluate groundwater screening data -- Permanent well(s) based upon screening data	Total Tc-99 and dissolved Tc-99 for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-42	10	Delineate Tc-99 in the floodplain downgradient of well W-4 and upgradient of LSL
	Surficial aquifer - upper zone east of monitoring well W-67	Groundwater	-- 1 or 2 DPT borings with multiple interval groundwater sampling -- If other COPCs are above the MCL in the first boring, install 1 additional groundwater screening boring east of the first boring -- Install 1 permanent monitoring well adjacent to the DPT boring with COPCs below MCL	Total Tc-99 and dissolved Tc-99 for DPT screening. TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99 for permanent well.	L-20	10	Groundwater Tc-99 delineation east of well W-67
Uranium	Upper Sunset Lake and Lower Sunset Lake	Sediment	-- 5 sediment transects -- 17 sediment sample locations -- Same sediment transects and sample locations as Phase I -- Collect sediment samples from the 0-0.5 ft, 0.5-1.0 ft depths -- Collect sediment samples from deeper 0.5 ft intervals if recovered in sampling equipment	CVOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	SED-19 through SED-22, SED-38 through SED-50	11	Vertical delineation of uranium in sediment in USL and LSL
	Mill Creek background area	Sediment	-- 1 additional background sediment transect -- 3 sediment sample locations -- Collect sediment samples from the 0-0.5 ft, 0.5-1.0 ft depths -- Collect sediment samples from deeper 0.5 ft intervals if recovered in sampling equipment	U	SED-57 through SED-59	11	Further assessment of background sediment U concentrations in Mill Creek upstream of the canal
	Middle Ditch sediment quality	Sediment	-- 3 sediment sample locations in Middle Ditch -- Samples upstream, downstream, and at the location of sediment sample SED-16 -- Collect sediment samples from the 0-0.5 ft, 0.5-1.0 ft depths -- Collect sediment samples from deeper 0.5 ft intervals if recovered in sampling equipment	CVOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	SED-16, SED-60 and SED-61	11	Further assessment of sediment quality in the Middle Ditch near sediment sample SED-16
	Surface water elevations in upstream areas of Mill Creek and the canal	Surface water	-- 1 staff gauge in Mill Creek immediately downstream of Entrance Dike -- 1 staff gauge in Mill Creek immediately upstream of Entrance Dike -- 1 staff gauge in the upstream end of the canal	Surface water elevations	N/A	11	Assess surface water elevations and gradients in the areas of the Entrance Dike and canal to compare to the surface water elevations in USL and LSL to understand the potential for backflow from USL

**Table 1**  
**Summary of Proposed Phase II RI Scope of Work**  
**Westinghouse Columbia Fuel Fabrication Facility**  
**Hopkins, South Carolina**

COPC or Area of Interest	Data Need	Environmental Media	Assessment Activities	Analytes	Boring or Monitoring Well Reference	Figure Reference	Purpose and Rationale
Sanitary Lagoon	Groundwater quality west of the Sanitary Lagoon	Groundwater	-- Well pair adjacent to the western side of the Sanitary Lagoon -- 1 surficial aquifer - upper zone monitoring well -- 1 surficial aquifer - lower zone monitoring well	TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	W-99 and W-100	6-10	Assess whether COPCs have migrated from Sanitary Lagoon sludge into the upper and lower zones of the surficial aquifer
	Sludge characterization	Sludge	-- Sludge characterization plan to be submitted under separate cover.	TCL VOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	N/A	N/A	Further assessment of COPCs within the sludge
Gator Pond	Sediment quality	Sediment	-- 6 sediment sample locations -- Collect sediment samples from the 0-0.5 ft, 0.5-1.0 ft depths -- Collect sediment samples from deeper 0.5 ft intervals if recovered in sampling tools	CVOCs, nitrate, ammonia, fluoride, isotopic U and Tc-99	SED-23 and SED-24, SED-62 through SED-65	11	Assess whether COPCs are present in sediment in the Gator Pond
	Effect of surface water elevation on nearby groundwater flow	Surface water and groundwater	-- 1 pressure transducer on the Gator Pond staff gauge -- 5 pressure transducers in monitoring wells W-04, W-15, W-16, W-27, and W-92 -- Evaluate data collected from transducers	Surface water and groundwater Levels	N/A	N/A	Evaluate the effect of the surface water head in the Gator Pond on groundwater flow in the surficial aquifer
Middle Ditch	Groundwater/surface water interaction	Surface water and groundwater	-- Survey portions of Middle Ditch and Eastern Ditch for elevations of the bottom of the ditches -- Middle Ditch from near the calcium fluoride pad to the confluence with Eastern Ditch -- Eastern Ditch from the pipe south of the East Lagoon to power line right of way near well W-62	N/A	N/A	12	Further understand the groundwater/surface water interaction within the deeply incised portions of the ditches
Multiple areas	Surface soil properties	Soil	-- Surface/shallow subsurface soils in multiple areas above the bluff and within the floodplain -- DPT coring to 4-5 feet -- Grain size analyses	Grain size	N/A	N/A	Assess properties of low permeability surface soil and shallow subsurface soil
Multiple monitoring wells	Hydraulic conductivity and average groundwater velocity	Groundwater	-- 11 slug tests on permanent monitoring wells -- Existing monitoring wells W-6, W-11, W-19B, W-67, W-68 -- 3 new wells above the bluff -- 3 new wells in the floodplain	N/A	N/A	N/A	Assess hydraulic characteristics and groundwater velocity of the surficial aquifer

- Notes:**
- CVOC - Chlorinated volatile organic compound
  - DPT - Direct push technology
  - TCL - Target compound list
  - VOC - Volatile organic compound
  - SCDHEC - South Carolina Department of Health and Environmental Control
  - PCE - Tetrachloroethene
  - COPC - Constituent of potential concern
  - MCL - Maximum contaminant level
  - AOC - Area of concern
  - USL - Upper Sunset Lake
  - LSL - Lower Sunset Lake
  - Tc-99 - Technetium 99
  - NRC - Nuclear Regulatory Commission
  - N/A - Not applicable



## **Attachment C: Sediment Sampling -Additional Information**

---

In addition to the multistage sampler presented in the original RI Phase II Work Plan, Westinghouse also proposes the use of a VibraCore sampler to collect sediment. VibraCore technology is a sampling methodology used for retrieving continuous, undisturbed core samples. VibraCore samplers can work in a variety of water depths and may be able to retrieve deeper core samples than what was achieved in the RI Phase I sediment sampling in Mill Creek.

Composite sediment samples from Sunset Lake will be analyzed for CVOCs, Nitrate, Fluoride, Uranium, and Tc-99. Samples will be collected up to three feet below sediment surface, or depth of refusal at the following increments: 0 – 0.5 ft, 0.5 – 1 ft, 1 – 2 ft, and 2 – 3 ft.

During the initial deployment for sediment sample collection and periodically throughout the sediment sample collection event, a field Geologist will examine the extracted sediment cores for evidence of a horizon that could represent the relic streambed surface from the former unimpounded Mill Creek sediments prior to the creation of Upper and Lower Sunset Lakes. Should a horizon be identified, the data will be shared with DHEC through regularly scheduled weekly communications and may be used to re-evaluate the sediment sample collection increments.

## Attachment D: Data Corrections, Revisions, and Clarifications

---

Westinghouse would like to make note for the Department, the following document revisions.

- **Structure Contour Map of the Top of the Black Mingo Confining Clay**

The Final Interim Remedial Investigation Summary Report was submitted to DHEC on July 15, 2020 (LTR-RAC-20-62). A structure contour map of the top of the Black Mingo confining clay was included in the submission in Appendix F as Figure A. Since the submission, a reference table was generated by AECOM to identify the source information for each boring used to generate Figure A. During creation of the table, the depth to the clay was revised in monitoring well W-39/boring B-10 (shown as W-39 on the figure). The reference table entitled “Top of Black Mingo Clay Structure Map Reference Table” and revised Figure A were included in the September 2020 monthly progress report as Attachment B.

Attached is the revised structure contour map of the top of the Black Mingo confining clay previously submitted in September.

- **B-B’ Cross Section Used in the Conceptual Site Model (CSM)**

A slide deck of the CSM (Revision 1a) was submitted to DHEC in July 2020 as part of the Final RI Interim Data Summary Report. Since the submission, it was noted that when the 15X vertical exaggeration was added, not all of the subsurface units increased in the corresponding exaggeration thickness. The following subsurface layers were revised to correspond to the 15X vertical exaggeration: the silt and clay layer beneath Upper Sunset Lake, the surficial silt layer south of Upper Sunset Lake, and the Black Mingo Confining Unit slope to match with the its depth below ground surface in boring L-1.

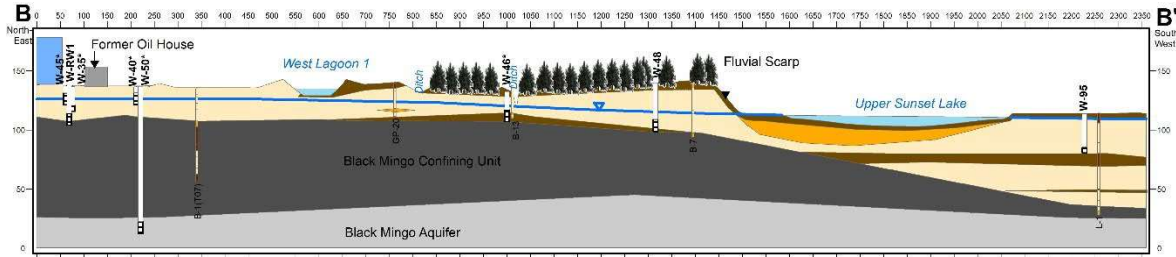
Attached is a revised cross section B-B’ of Rev. 1a of the Conceptual Site Model.

- **Table 1, Summary of Proposed Phase II RI Scope of Work**

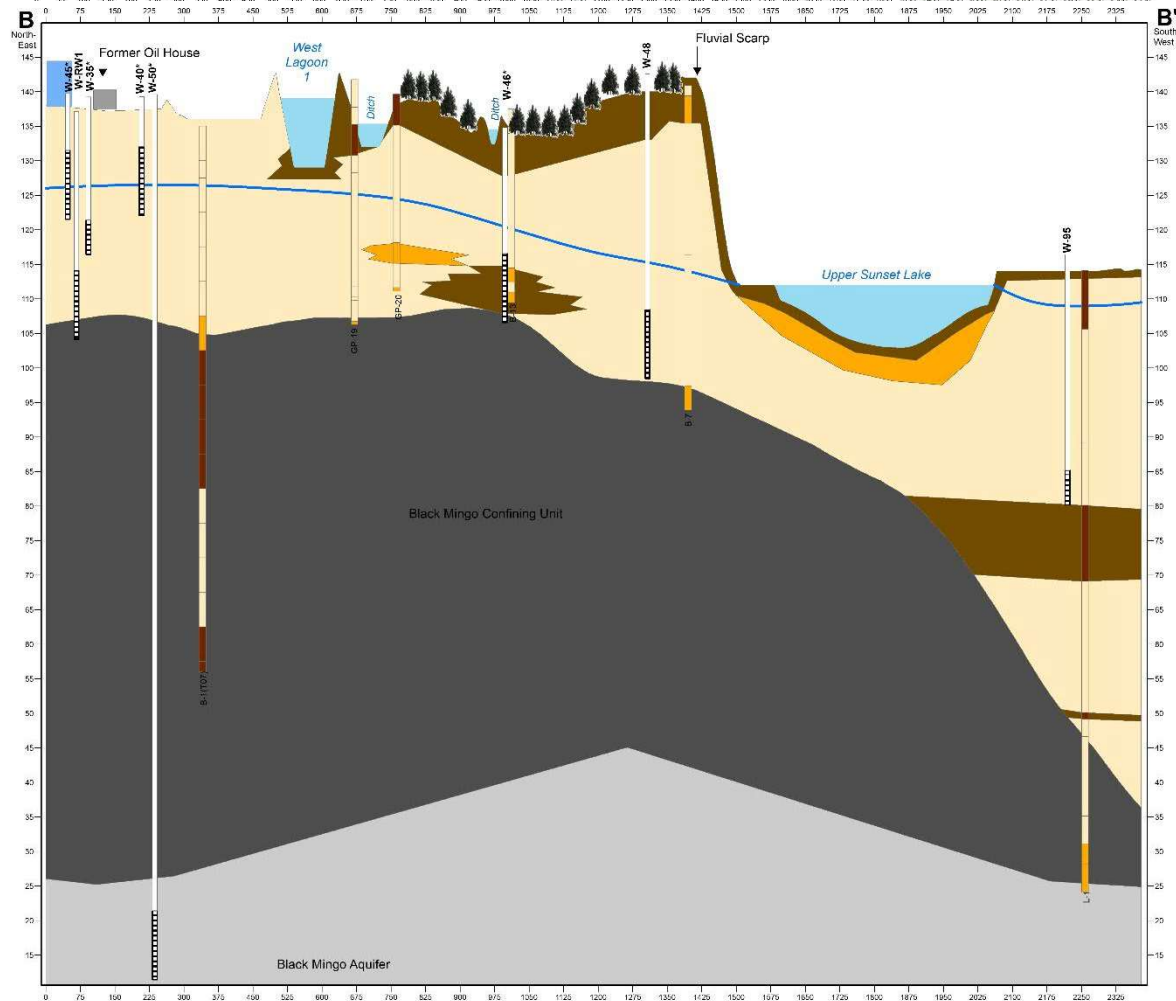
The Phase II RI Work Plan submitted on September 15, 2020 (LTR-RAC-20-72) included a table that summarized the proposed scope of work (**Table 1**). A *revised Table 1* is included with this addendum in Attachment B and replaces an incorrect reference to Figure 11 on page 4 for the middle ditch and eastern ditch survey area. The corrected reference is Figure 12.



# Site CSM Cross Sections



2.5X Vertical Exaggeration



15X Vertical Exaggeration

Wells up to 75' away from the transect are projected onto the cross sections. Wells that are >20 ft and less than 75 ft are indicated with an asterisk (\*).

## Legend

