

STATEMENT OF BASIS
Cooper River Partners, LLC
Goose Creek, Berkeley County, South Carolina
SCD 048 373 468

PURPOSE OF THE STATEMENT OF BASIS

This Statement of Basis has been prepared to inform the public and provide an opportunity to comment on the proposed remedies at Cooper River Partners in Goose Creek, SC. Cooper River Partners is located at the Charleston International Manufacturing Center, 1588 Bushy Park Road, Goose Creek, South Carolina 29445. The Charleston International Manufacturing Center was formerly known as the Bushy Park Plant.

The October 2022 Corrective Measures Study (CMS) Report evaluated several remedies for SWMUs 3 and 8, and the May 2025 CMS Report summarized the remedy options for SWMU 6. Based on the CMS reports, the South Carolina Department of Environmental Services (SCDES) has approved land-use controls restricting land usage to industrial only and prohibiting shallow groundwater usage for SWMUs 3, 6, and 8. Additionally, SCDES approved Monitored Natural Attenuation for SWMU 8.

Below is a table listing the SWMUs and AOCs and their specific proposed remedies:

| SWMU or AOC Number/Name | Description of Proposed Remedy |
|--------------------------------|---|
| SWMU 3 (Aeration Pond #1) | Land Use Controls, Semi-annual Monitoring and Corrective Action (Groundwater Recovery) associated with closed Equalization Pond |
| SWMU 6 (Settling Pond #2) | Land Use Controls & Corrective Action (backfilling/capping with clean fill) |
| SWMU 8 (Settling Pond #1) | Land Use Controls & Monitored Natural Attenuation (MNA) |

SCDES has determined that the proposed remedies are protective of human health and the environment. However, prior to final selection, the public has an opportunity to comment. At any time during the public comment period, the public may comment as described in the "How Do You Participate?" section. Upon closure of the public comment period, SCDES will evaluate all comments and questions and determine whether there is a need to modify the proposed remedies.

HOW DO YOU PARTICIPATE?

SCDES solicits public review and comment prior to approval of the proposed remedy for the listed SWMUs. The public comment period begins on **November 18, 2025**, and continues until **January 9, 2026**.

The Statement of Basis and supporting documents associated with the investigations and proposed remedies are available to the public for review during regular business hours, Monday through Friday, except legal holidays at the following locations:

SCDES
Division of Waste Management
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201

Any comments on the proposed remedy and/or requests for a public hearing should be sent to:

Kent Krieg, Director
Division of Waste Management
Bureau of Land and Waste Management
South Carolina Department of Environmental Services
2600 Bull Street
Columbia, South Carolina 29201
Phone (803) 898-0255
Email: Kent.Krieg@des.sc.gov

Written comments or requests for a public meeting must be submitted no later than **January 9, 2026**, at which time the public comment period will end.

FACILITY DESCRIPTION

Cooper River Partners, LLC (CRP) is located at the Charleston International Manufacturing Center (formerly Bushy Park industrial complex) in Berkeley County, South Carolina. The facility is located east of the U.S. Naval Reservation between the Back and Cooper Rivers, bordering the facility's western and eastern boundaries, respectively. The CRP facility was originally constructed in the late 1960's and began dye plant operations under the name of Verona in 1970. In 1975, Verona became a division of the Mobay Chemical Company under the holding company of Bayer USA, Incorporated. On January 1, 1992, Mobay merged into and became part of Miles Inc. In September 1992, Miles acquired the "over-the-counter" (OTC) drug business of Sterling Winthrop from SmithKline Beecham, which included the right to use the Bayer name and trademark in North America. On April 1, 1995, the name change

to Bayer Corporation became effective. On July 1, 2004, Bayer Corporation spun-off its chemical operations to form an independent company by the name of Lanxess Corporation. On November 13, 2009, Lanxess Corporation sold the Bushy Park Site and the Technical Services infrastructure to CRP.

Bushy Park is home to nine tenant facilities, including Lanxess Corporation, Chromascope, DCL Corporation, KAM, Symrise, Agfa Corporation, Evonik, Nexans, and DRS Corporation. CRP provides utility and “soft” services to the Bushy Park tenants, including steam, compressed air, other distribution services, security and occupational health.

PERMIT HISTORY

Mobay Corporation was issued a Hazardous Waste Permit No. SCD 048 373 468 on June 1, 1987 for the storage of hazardous waste and the post-closure care and corrective action of two surface impoundments.

Bayer Corporation was issued Renewal Hazardous Waste Permit No. SCD 048 373 468 on August 10, 1995 and again on September 28, 2001. Cooper River Partners was issued PostClosure Care Permit No. SCD 048 373 468 on May 1, 2013.

The current permit expired on May 30, 2023, but has been administratively extended until the permit renewal process is complete. A permit renewal application was submitted to SCDES on November 29, 2022.

The Hazardous Waste Management Permit includes Postclosure care for the closed impoundments and also addresses corrective action requirements for Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs).

One hundred and six (106) SWMUs and seven (7) AOCs have been identified at the facility. SCDES has determined that ninety-six (96) SWMUs and AOCs do not require any further action at this time. The current permit requires corrective action for twelve (12) SWMUs and two (2) AOCs. Corrective action consists of Land Use Control restrictions, groundwater monitoring, groundwater extraction, and monitored natural attenuation (MNA).

PROPOSED REMEDIES

The selected remedies consist of land use controls for SWMUs 3, 6, and 8, backfilling/capping with clean fill for SWMU 6, groundwater monitoring and extraction for SWMU 3, and groundwater monitoring and MNA for SWMU 8. The selected remedies set restrictions on land and groundwater use and provide long-term groundwater monitoring.

PUBLIC PARTICIPATION

To facilitate public participation in the corrective action process, the following actions have been taken:

- An information Repository has been established at the SCDES Main Office in Columbia, SC.
- A Public Notice, Fact Sheet, and this Statement of Basis have been developed.
- A mailing list has been prepared for distribution of the Public Notice; and
- The Public Notice, Statement of Basis, Fact Sheet, draft permit, and other documents related to the site have been placed on the SCDES public notice page at SCDES's Website at <https://des.sc.gov/PublicNotices>.

NEXT STEPS

Following consideration of public comments by SCDES, a revised Final Decision and Response to Comments (FDRTC) accepting or rejecting the proposed corrective action will be issued.