

Georgia Department of Natural Resources

Land Protection Branch Environmental Protection Division

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Phone: (404) 657-8600/ Fax: (404) 657-0807

Judson H. Turner, Director

May 19, 2014

VIA E-MAIL AND REGULAR MAIL

Mohawk Industries, Inc.
c/o Denise Wood
405 Virgil Drive
Dalton, Georgia 30722

COPY

Re: VRP-Semiannual Progress Reports, October 2012, April 2013, October 2013, March 2014
Diamond Rug and Carpet Mills-Eton Plant Property, HSI Site No. 10534
4140 Highway 411, Eton, Murray County, Georgia
Tax Parcel 0064A 090

Dear Ms. Wood:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) Semiannual Progress Reports dated October 2012, April 2013, October 2013, and March 2014 (Reports). The Reports were submitted by GaiaTech on behalf of Mohawk Industries, Inc. (Mohawk Industries) for the subject tax parcel (the "Property") in accordance with the schedule specified in EPD's April 12, 2012 conditional approval of the VIRP. EPD offers the following comments:

VIRP Application Checklist

1. Tax parcel identification numbers are to be shown on the tax plat or another VIRP figure, for the qualifying and abutting properties, as required by Item 3 of the Application Checklist. Please ensure that future reports include at least one figure that is appropriately scaled to show property boundaries and tax parcel ID numbers.

Conceptual Site Model

2. The following comments address the status of each exposure pathway:
 - a. Groundwater Pathway: EPD concurs that delineation of the horizontal groundwater plume is complete on the property based on data provided in the subject Reports, however; the vertical extent of contamination in groundwater has not been defined pending the completion of an assessment of the deep aquifer (See Comment #3).
 - b. Surface Water Pathway: EPD cannot agree that the surface water pathway is incomplete, pending the results of the deep aquifer assessment, which is to be conducted in accordance with Section 5.2 of the conditionally approved VIRP (see Comment #3 of EPD's April 12, 2012 Comment letter).
 - c. Soil Pathway: Based on the February 2013 post remediation soil investigation results, EPD agrees that soil concentrations are in compliance with Type 1 RRS.
 - d. Vapor Intrusion Pathway: Based on the vapor intrusion evaluation included in the October 2012 Report, EPD agrees that the vapor intrusion pathway does not pose a significant risk.

Investigation and Remediation Plan

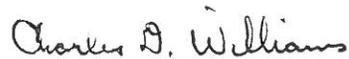
3. The March 2014 Report proposes to redevelop and resample monitoring well OW-8D and install a deeper delineation well if OW-8D yields unfavorable results [remains impacted above Type 1 RRS]. Please note that the installation of a vertical delineation well is required on the property to satisfactorily define the vertical extent of contamination to Type 1 RRS.
4. Please note that the Type 2 RRS for 1,1-dichloroethene in groundwater is 0.103 mg/L, and current sample results are in compliance.

General

5. Please add depth of submersible pump information to the monitoring well purging and sampling information sheets. This information is used to determine if sampling was conducted in accordance with standard operating procedures.
6. When the low-flow purge method is used, the USEPA SESD standard operating procedure, Groundwater Sampling (SESDPROC-301-R3), requires that the water level in the well be monitored so that it can be confirmed that drawdown is "slight and stable" to insure that the water being produced from the well is from the formation. During the September 2013 sampling event, the water level during purging was not reported at regular intervals for any of the wells sampled. In future sampling events please monitor and record the water level during purging and reduce pump speed so as to limit drawdown to less than 0.33 feet.
7. The well purging and sampling data form used in the September 2013 sampling event did not include information on the location or length of the well screen. The low-flow purging method requires that the pump intake be placed at or just above the mid-point of the well screen and not in the center of the measured water column. Please enter the depth to the top of the well screen and its length on the sampling form and place the pump intake accordingly.
8. EPD noted that the sampling logs for wells OW-5, OW-2, OW-8D, and MWW-1 for the September 21, 2013 sampling event shows that these wells had not stabilized with respect to turbidity when the samples were collected. In SESDPROC-301-R3, stability is indicated by three consecutive measurements in which the pH remains constant within +/- 0.1 standard units, the specific conductance varies no more than approximately 5%, and the turbidity has either stabilized or is below 10 NTUs. If stability is not reached after three well volumes have been removed from the well, SESDPROC-301-R3 calls for purging to continue until stability is reached or until at least five well volumes have been purged prior to sample collection.

The next VIRP progress report, which should finalize vertical delineation on all impacted properties, finalize the conceptual site model (CSM) and the remedial plan (if necessary), and address the comments listed above, must be submitted by October 12, 2014. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-0487.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Aladdin Manufacturing c/o Ernst Young, LLP
GaiaTech, David Buchalter, P.E.

File: HSI 10534, ID No. 205-0011

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