

ENVIRONMENTAL PROTECTION DIVISION

September 27, 2016

Land Protection Branch

Richard E. Dunn, Director

2 Martin Luther King, Jr. Drive Suite 1054, East Tower Atlanta, Georgia 30334 404-657-8600

VIA E-MAIL AND REGULAR MAIL

Cessna Aircraft Company c/o Mr. Gregory Simpson Director, Site Remediation 40 Westminster Street Providence, Rhode Island 02903

Re: Voluntary Investigation and Remediation Plan and Application, March 24, 2016

Cessna Aircraft Company

4800 Cargo Drive

Columbus, Muscogee County, Georgia

Tax Parcel: 112 003 002

Dear Mr. Simpson:

The Georgia Environmental Protection Division (EPD) is in receipt of the Voluntary Investigation and Remediation Plan (VIRP) and application dated March 24, 2016, submitted for the above referenced property (the Property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). As a result of the VIRP submittal, EPD has deferred the release determination for the groundwater and on-site pathway evaluations pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. These pathways will be evaluated after the site cleanup activities are complete in accordance with the VIRP and upon receipt of the final Voluntary Remediation Program (VRP) Compliance Status Report (CSR) and risk reduction standards compliance certification.

After completing its review, EPD is approving your VIRP and application, which specifies corrective action consisting of the following:

- **Groundwater** Monitor groundwater at the Site by conducting semiannual sampling and development of a Focused Feasibility Study (FFS) to identify the best alternative for mitigating off-property volatile organic compound (VOC) migration.
- **Vapor Intrusion** Evaluate and mitigate vapor intrusion.
- Soil Evaluate and potentially conduct soil remediation to reduce VOC loading in groundwater based on present risk, current property use, and future potential property use.
- Environmental Covenant Execute an environmental covenant for the site in conformance with O.C.G.A. 44-16-1, et seq., the "Georgia Uniform Environmental Covenants Act."

Therefore, EPD is accepting Cessna Aircraft Company (Cessna) as a participant as defined in the Act for the following qualifying property, provided Cessna implements the VIRP in compliance with the Act, the proposed schedule, and the following comments.

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Qualifying property:

4800 Cargo Drive Columbus, Muscogee County, Georgia

Tax Parcel: 112 003 002

Comments:

- 1. In future progress reports that contain analyses related to the potential vapor intrusion pathway please include the Vapor Intrusion Screening Level (VISL) worksheets as an appendix for EPD review.
- 2. Should future investigations encounter any machine oil source material that may adversely impact compliance or remedial objectives, please incorporate any necessary remedial measures.

EPD requires that Cessna and the professional engineer/geologist specified in the Application oversee the implementation of the VIRP in accordance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Cessna. However, failure of EPD to respond to a submittal within any timeframe does not relieve Cessna from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Cessna fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the VRP.

EPD anticipates receipt of the first semiannual progress report by March 27, 2017 and a CSR, including certification, on or before September 27, 2021. If you have any questions regarding this matter, please contact Robin Futch, PG of the Response and Remediation Program at (404) 657-8686.

Sincerely,

Jason Metzger Program Manager

Response and Remediation Program

C: Andrew Romanek CDM Smith

File: 258-0009 (C067) - Cessna Aircraft Company

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