

# Georgia Department of Natural Resources

## Environmental Protection Division

2 Martin Luther King, Jr. Dr., S.E., Suite 1054 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

Phone: 404/657-8600 FAX: 404/657-0807

### VIA EMAIL AND FIRST-CLASS MAIL

April 16, 2014

Carpenter Technology Corporation  
c/o Sean McGowan  
105 West Bern Street  
Redding, Pennsylvania 19612

COPY

Re: Conditional Approval of Entry Into Voluntary Remediation Program  
Revised Voluntary Remediation Program Application of December 2013  
General Time Corporation, HSI Site No. 10355  
100 Newton Bridge Road, Athens, Georgia; Clarke County  
Tax Parcel ID No. 112 003

Dear Mr. McGowan:

The Georgia Environmental Protection Division (EPD) has reviewed the December 2013 Revised Voluntary Investigation and Remediation Plan (VIRP), submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act). The VIRP was submitted in lieu of ongoing corrective-action reporting required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above-referenced property. EPD is conditionally approving your VIRP, which specifies corrective action consisting of the following:

- Monitored natural attenuation (MNA) of contaminated groundwater on site.

Other corrective-action alternatives will have to be evaluated and implemented as well, as specified later in this letter.

Therefore, EPD is accepting Carpenter Technology Corporation as a participant as defined in the Act for the following qualifying property, provided Carpenter Technology Corporation implements the VIRP in compliance with the following schedule and conditions:

Qualifying Property:

General Time Corporation  
100 Newton Bridge Road  
Athens, Georgia; Clarke County  
Tax Parcel ID 112 003

Because Carpenter Technology Corporation is performing corrective action at the qualifying property in accordance with an approved voluntary remediation plan, EPD is hereby reclassifying it from Class II to Class V and designating it as needing corrective action as provided for in §12-8-079(b) of the Act.

Within 45 days of this letter, you are required to file an affidavit stating that your property has been listed on the state's hazardous site inventory and has been designated as needing

corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. This affidavit is to be filed with the clerk of the Superior Court of Clarke County and recorded in the clerk's deed records pursuant to O.C.G.A. §44-2-20.

Carpenter Technology Corporation must also place the following notice in any deed, mortgage, deed to secure debt, lease, rental agreement, or other instrument given or caused to be given by the property owner which creates an interest in or grants a use of the property:

"This property has been listed on the state's hazardous site inventory and has been designated as needing corrective action due to the presence of hazardous wastes, hazardous constituents, or hazardous substances regulated under state law. Contact the property owner or the Georgia Environmental Protection Division for further information concerning this property. This notice is provided in compliance with the Georgia Hazardous Site Response Act and the Voluntary Remediation Program Act."

Within 30 days of recording the affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, Georgia, 30334.

#### **Conditions of VIRP Approval**

- 1) Properties downgradient of the General Time site that are impacted by the dissolved contaminant plume are to be identified and brought into the VRP as additional qualifying properties. Under an MNA remedial approach, impacted properties between the General Time site and the Oconee River would need environmental covenants restricting groundwater usage.
- 2) Submit a plan for addressing source material for the high TCE concentrations in groundwater at the MW-16 well cluster. The term "source material," as defined in the Georgia Rules for Hazardous Site Response, Chapter 391-3-19, means "any material that includes or contains regulated substances that act or may likely act as a reservoir for migration of regulated substances to groundwater, soil, surface water, or air, or acts as a source for direct exposure."
- 3) The following must be included in the specified progress reports:
  - a) October 16, 2014: A plan for remediating source material on-site.
  - b) April 16, 2015: A list of downgradient qualifying properties to be brought into the VRP under the General Time site. The property owners must agree to be brought into the VRP, which will require them to sign an environmental covenant restricting groundwater use on their properties.
  - c) October 16, 2016: Demonstration of complete horizontal and vertical delineation, finalize the remediation plan, and provide a cost estimate for implementation of remediation and associated continuing actions. EPD recommends that the participant finalize approval of cleanup standards for all regulated substances prior to this submittal.

Carpenter Technology Corporation and the professional engineer/geologist specified in the VIRP are to 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 Carpenter Technology Corporation. However, failure of EPD to respond

to a submittal within any timeframe does not relieve Carpenter Technology Corporation from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should Carpenter Technology Corporation fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the VRP.

Semiannual progress reports are to be submitted to EPD. Each progress report must describe all actions taken since the last submittal, and include certification by the professional engineer/geologist specified in the VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal. EPD anticipates receipt of the first semiannual progress report by October 16, 2014, and a Compliance Status Report, including certification, on or before April 16, 2019. If you have any questions, please contact Allan Nix of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Charles D. Williams  
Program Manager  
Response and Remediation Program

c: Mark Miesfeldt, Haley & Aldrich (via email)

File: HSI No. 10355