

Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., S.E., Suite 1066 East, Atlanta, Georgia 30334

Reply To:
Response and Remediation Program
2 Martin Luther King, Jr. Drive, S.E.
Suite 1462, East Tower
Atlanta, Georgia 30334-9000
Office 404/657-8600 Fax 404-657-0807

Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Mark Smith, Branch Chief

February 24, 2012

VIA EMAIL & REGULAR MAIL

Mr. John Perkins
Director of Environmental Health and Safety
Scott Technologies, Inc.
6600 Congress Avenue
Boca Raton, Florida 33487

Re: April 29, 2011 Voluntary Remediation Plan Application
& November 14, 2011 VRP Application Addendum
Former Automatic Sprinkler Site, HSI #10268
Swainsboro, Emanuel County, GA
Tax Parcel ID S12 005

Dear Mr. Perkins:

The Georgia Environmental Protection Division (EPD) has received the April 29, 2011 Voluntary Remediation Program (VRP) application and November 14, 2011, VRP Application Addendum that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. EPD acknowledges that this VRP application was submitted in lieu of a revised corrective action plan (CAP) required pursuant to the Georgia Rules for Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your VRP application, which specifies corrective action consisting of the following:

- Execute engineering and/or institutional controls in the form of environmental covenants on the qualifying property(ies) in conformance with O.C.G.A. 44-16-1, et seq., the 'Georgia Uniform Environmental Covenants Act'.
- Implement a monitoring and natural attenuation (MNA) remedy consisting of a minimum of 5-years of groundwater and surface water monitoring with applied updates to the applicable site related groundwater model.
- Conduct additional soil and groundwater investigation activities that will be compared to appropriate screening levels to confirm if an exposure pathway is complete or if revisions must be made to above referenced engineering and/or institutional controls. Should one of these exposure pathways pose an unacceptable risk, measures to develop and implement a corrective action to mitigate the risk will be required.

Therefore, EPD is accepting Scott Technologies, Inc. (STI) as a participant as defined in the Act for the following qualifying property provided STI implements the VRP application in compliance with the following schedule and conditions:

Qualifying property:

Former Automatic Sprinkler Site
162 East Meadowlake Parkway
Swainsboro, Georgia 30401
Tax Parcel ID S12 005

Within six months of detecting regulated substance(s) on a non-qualifying property, the participant must apply to EPD to include the affected property as a qualifying property under the Act or notify EPD that the non-qualifying property is not included under the Act.

Schedule:

- 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 VRP application along with a monthly summary of hours invoiced and description of services provided since the last submittal.
 - August 24 and February 24 through August 24, 2016

In addition to the information required above, the following must be included in the specific progress reports discussed below.

- February 24, 2013 semiannual progress report must include the vapor intrusion, surface water, and groundwater pathway evaluation for the qualifying property;
 - February 24, 2014 semiannual progress report must demonstrate complete horizontal delineation on all impacted properties; and,
 - August 24, 2015 semiannual progress report must demonstrate 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 participant finalize approval of cleanup standards for all regulated substances prior to this submittal.
- Compliance status report including certifications by no later than:
 - February 24, 2017

Conditions:

- 1) EPD requests the submittal of a cost estimate to complete the work proposed in the VRP application through the CSR submittal and a financial assurance instrument in that amount by no later than May 24, 2012. Model financial assurance instruments can be located at http://www.gaepd.org/Files_PDF/forms/hwb/HSIModel.pdf.

- 2) STI must address EPD's comments dated February 24, 2012, and any other comments addressing the investigation and remediation pursuant to the Act to the satisfaction of the Director that it is consistent with the provisions, purposes, standards and policies of the Act.
- 3) Within ninety (90) days of STI's notice to withdraw from the Voluntary Remediation Program or termination by the Director pursuant to §12-8-107(d) of the Act, STI must submit the required revised CAP or a compliance status report that complies with the requirements of the Hazardous Site Response Act and associated Rules for Hazardous Site Response.
- 4) STI must pay all outstanding fees within sixty (60) days of receipt of an invoice for any costs to the division in reviewing the application or subsequent document the exceeds the initial application fee.

EPD requires that STI, and the professional engineer/geologist specified in the VRP application, oversee the implementation of the VRP investigation and corrective action activities 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 STI. However, failure of EPD to respond to a submittal within any timeframe does not relieve STI from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should STI fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program.

EPD's approval of the VRP application extends only to those technical aspects of the document that expressly require EPD approval under applicable rules and statutes. This approval is not an endorsement by EPD that it accepts as conclusive any representations made in the document. Nor does EPD guarantee or warrant that the document is free of errors or omissions. EPD may later withdraw approval of this document, in whole or in part, if EPD determines that withdrawal is necessary to ensure compliance with the applicable rules and statutes. Should you have any question or concerns regarding this site, please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 657-0488.

Sincerely,



David Brownlee
Acting Program Manager
Response and Remediation Program

c: Andy Riley, Emanuel County Joint Development Authority
Anita Bucci, Teleflex Incorporated
Cynthia Draper, MACTEC

File: VRP Application 919182852 – Former Automatic Sprinkler Site #10268
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