

Georgia Department of Natural Resources
Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

April 13, 2015

VIA EMAIL & REGULAR MAIL

Joe Renzetti, President
Roper Pump Company
3475 Old Maysville Road
Commerce, GA 30529

FILE COPY

Re: HSI Site Number: 10901
Roper Pump Company
Tax Parcel ID #034-032
3475 Old Maysville Road
Commerce, Jackson County, GA

Dear Mr. Renzetti:

The Georgia Environmental Protection Division (EPD) has received the December 2014 Voluntary Investigation and Remediation Plan (VIRP) 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 VIRP was submitted in lieu of a Corrective Action Plan (CAP) Addendum and Compliance Status Report required pursuant to the Georgia Rules of Hazardous Site Response (the Rules) for the above referenced property. EPD is approving your VIRP, which specifies corrective action consisting of the following:

- Continued use of existing soil vapor extraction system for soils.
- While a number of remedial options were evaluated and indicated as viable applications for the site, the 2014 VRP Application did not include any recommendations to implement a specific corrective action for groundwater which would lead to the site meeting a proposed VRP compliance standard. EPD concurs with the exploration of potential technology remedies.

Therefore, EPD is accepting Roper Pump as a participant as defined in the Act for the following qualifying properties provided Roper Pump implements the VIRP in compliance with the following schedule and conditions:

Qualifying properties:

Roper Pump Company
Owner: Joe Renzetti
Main Site Property: 3475 Old Maysville Road
Commerce, Jackson County, Georgia 30529
Qualifying Property Tax Parcel ID #: 034-032,

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 VIRP along with a monthly summary of hours invoiced and description of services provided since the last submittal.
- The reporting schedule will be January 15th and July 15th annually, beginning in July 2015 and ending in 2020, unless a compliance status report (CSR) is submitted and approved prior to 2020.
- A CSR including certifications should be submitted by July 15, 2020.

In addition to the reporting schedule specified above, the following must be included in the January 15, 2017, progress report:

- 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, if applicable, for all regulated substances prior to this submittal.

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.

Since EPS is performing corrective action at the qualifying property in accordance with an approved VIRP, the qualifying property will be classified as a Class V site and designated as needing corrective action as provided for in §12-8-107(b) of the Act. Within 45 days of this letter, you are required to file an affidavit, if not previously filed, 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 Jackson County and recorded in the clerk's deed records pursuant to O.C.G.A. § 44-2-20.

EPS must also place the following notice, or revise previous notices recorded pursuant to the Georgia Hazardous Site Response Rules, Chapter 391-3-19, 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."

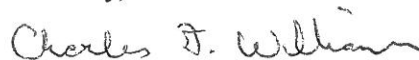
Within 30 days of recording the affidavit or revised affidavit, please send a copy of the receipt of the recorded affidavit to the Response and Remediation Program, Georgia Environmental Protection Division, 2 Martin Luther King Jr. Drive, SE, Suite 1054 East, Atlanta, GA 30334.

Conditions of the VIRP approval

- According to EPD's August 22, 2014, letter, due to the release of multiple metals (arsenic, lead, chromium, hexavalent chromium, mercury, and cadmium) within the former storm sewer and the downgradient surface water outfall area the VRP Application should have included plans for the basic environmental assessment/investigation of the site related chromium plating operation (tax parcel ID#034 032H). The VRP Application did not include any assessment/investigation or future plans to conduct such activities to address concerns that the adjacent site related chromium plating operation (tax parcel ID#034 032H) may be acting as a contributing source of the previously remediated release identified in the surface water outfall area. Please conduct the necessary assessment/investigation activities at this property.

EPD requires that EPS and the professional engineer/geologist specified in the VRP application oversee the implementation of the VRP application 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 EPS. Failure of EPD to respond to a submittal within any timeframe does not relieve EPS from complying with the specified schedule and the provisions, purposes, standards and policies of the Act. Should EPS fail to comply with the above schedule, EPD may terminate enrollment of the participant and the qualifying property from the voluntary remediation program. Should you have any question or concerns regarding this site, please contact Ms. Elise Chew of the Response and Remediation Program at (404) 463-7555.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

cc: Justin Vickory, EPS
File: VRP – Roper Pump #10901