

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

June 30, 2015

VIA EMAIL & REGULAR MAIL

United Technologies Corporation
c/o Beth Lang, Remediation Manager
5469 Jacobs Drive
Holly, Michigan 48442

Re: Voluntary Investigation and Remediation Plan and Application (March 12, 2015)
Annual Progress Report/MNA Effectiveness Report (March 17, 2014)
Annual Progress Report/MNA Effectiveness Report (June 8, 2015)
Former United Technologies Automotive Site, HSI # 10543
1884 Warrenton Highway, Thomson, McDuffie County, Georgia
Tax Parcel ID # 00200056

Dear Ms. Lang:

The Georgia Environmental Protection Division (EPD) has reviewed the March 17, 2014 and June 8, 2015 Annual Progress Report/MNA Effectiveness Reports for the above-referenced site documenting activities that occurred during 2013 and 2014, respectively. EPD has also reviewed the March 12, 2015 Voluntary Remediation Program (VRP) application that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100. This VRP application will replace the approved December 2008 Corrective Action Plan for the above referenced property. EPD is approving your VRP application, which specifies corrective action consisting of the following:

1. Annual groundwater monitoring and reporting for a period of two (2) years.
2. Execution of a Uniform Environmental Covenant (UEC), to ensure future control of the site related exposure pathway(s).

Therefore, EPD is accepting United Technologies Corporation as a participant as defined in the Act for the following qualifying property provided the VRP application is implemented in compliance with the Act and the following comments:

Qualifying property:

Former United Technologies Automotive Site
1884 Warrenton Highway
Thomson, McDuffie County, Georgia
Tax Parcel ID # 00200056

Comments:

1. EPD's September 13, 2013 letter stated if monitoring well M-17 does not satisfy vertical delineation in the source area, a deeper well may be required. An upward trend of TCE concentrations has been observed at M-17 from 2012 to 2014. EPD disagrees with Section 4.0, #5 of the May 2015 APR/MNA Effectiveness Report, which states the Mann-Kendall trend analysis results indicated that the concentrations of the constituents of interest (COI) in the monitoring wells that exceed the Type 4 risk reduction standards (RRS) are decreasing or stable. The MAROS Mann-Kendall Statistics Summary documented in Appendix E of the report shows TCE at M-17 as probably increasing with a confidence trend of 93.2%. EPD is not requiring that a deeper well be installed at this time; however, as proposed, please ensure M-17 be sampled during each groundwater sampling event. In accordance with the VRP

Application Checklist, vertical delineation is required within 30 months of enrollment. Therefore, further actions, such as the addition of a deeper groundwater monitoring well, may be required in close proximity to M-17.

2. Appendix F of the March 2015 VRP Report states there were no unacceptable vapor intrusion risks posed by the COIs reported at the site using the Johnson and Ettinger (J&E) vapor intrusion model. The EPA Vapor Intrusion Screening Level (VISL) Calculator is recommended as the initial screening tool for evaluating vapor intrusion potential. Particularly with regard to TCE and vinyl chloride, the VISL Calculator accounts for mutagenic modes of action while EPA's implementation of the Johnson and Ettinger Model does not. Because groundwater depths near the west portion of the building have been measured at less than one foot below ground surface and due to the presence of COIs, particularly TCE and vinyl chloride in groundwater, EPD requires further assessment of vapor intrusion analysis. In order to further assess the vapor intrusion potential at this site, please provide a soil gas sampling plan and proposed locations in the next report.
3. EPD agrees with Section 2.0 of the March 2014 APR/MNA Effectiveness Report stating wells M-1R, M-12, and M-12R should be rehabilitated or properly abandoned and reinstalled. Wells M-1R and M-12R are the furthest downgradient wells that separate the source area from the northeast boundary of the site. Because VOC concentrations have been consistently reported at M-1R and M-12R, EPD recommends a surveyor locate and attempt to properly rehabilitate the wells and that they be included in the annual sampling. No VOC concentrations have been reported at M-12; therefore, EPD recommends a surveyor locate and attempt to properly abandon the well. M-12R was excluded from all figures of the 2014 and 2015 APR/MNA Effectiveness Reports and the March 2015 VRP Report. It is assumed M-12R is located directly adjacent to M-12. Please include the location of M-12R on all appropriate figures in future reports.
4. Several groundwater sampling parameter readings were missing on the field form sheets located in Appendix A of the March 2014 APR/MNA Effectiveness Report, including turbidity and dissolved oxygen. Please list all parameter readings collected during groundwater sampling. Without these readings, appropriate stabilization for sampling cannot be determined. In addition, the turbidity readings documented in the 2014 and 2015 APR/MNA Effectiveness Report for several wells exceeded 10 NTUs when the groundwater samples were collected. Stability criteria require that turbidity be stabilized or be less than 10 NTUs. Please make all reasonable attempts to achieve these turbidity levels following SESDPROC-301-R3. In addition, please indicate the depth at which the sample tubing is placed within the well column during future sampling events. The depth at which the water is withdrawn from the well column is critical to detect accurate concentrations of the associated COIs that are reported at this site.
5. Section 3.3 of the March 2015 VRP Report indicates that M-3 and M-3A are to be used as a Point of Demonstration Well (POD). EPD agrees with designating these wells as the POD wells due to the down gradient location and similarly screened interval as the suspected source area wells. EPD requests that M-4 also be added as a POD because groundwater flow direction is historically not only towards the east but also slightly toward the northeast.
6. The March 2015 VRP report states, "The VRP Property Evaluation Form will be submitted annually for a five (5) year period after the deed restriction is in place." However, the environmental covenant requires ongoing reporting to EPD demonstrating compliance, until such time residential RRS are achieved.

7. Per the June 13, 2014 email addressed to Bryan Kielbania, please continue to analyze for total VOCs, rather than the subset proposed in Section 4.0 of the March 2014 APR/MNA Effectiveness Report.
8. Please update all figures to correctly identify the details within the property. The fence-line along the northwest side of the property and propane tanks on the north part of the property could not be located during a May 15, 2015 EPD site visit. Please update the figures appropriately and correctly outline the northern part of the main building, which appears to be incorrectly drawn. Also, M-09 could not be located during the EPD site visit and recent activity of a concrete pad pour may have covered the well. Please report any damage or absence of M-09 in the upcoming report as this well is listed as a former source monitoring well.
9. EPD has reviewed the soil analysis provided in Table 2-1 of the March 2015 VRP Report and concurs with your certification that the Type 1 RRS for soils have been met.

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

EPD anticipates receipt of the first semi-annual progress report by January 5, 2016 and a compliance status report, including certification, on or before July 5, 2020. Should you have any question or concerns regarding this site, please contact Mr. Peter E. Johnson, P.G. of the Response and Remediation Program at (404) 657-0490.

Sincerely,



Jason Metzger
Acting Program Manager
Response and Remediation Program

cc: Tracey Hall, AECOM (via email)
Matthew Buschbacher, HP Pelzer Automotive Systems, Inc. (via email)

File: HSI# 10543