

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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

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

Richard E. Dunn, Director

July 11, 2016

VIA E-MAIL AND REGULAR MAIL

Precision Machine of Savannah, Inc.
c/o Mr. David Johnson, Operations Director
6 Telfair Place
Savannah, Georgia 31415

Re: Precision Machine of Savannah
6 Telfair Place
Savannah, Chatham County, Georgia 31415
Tax parcel IDs: 6-0737-01-009 and 6-0737-01-010

Dear Mr. Johnson:

The Georgia Environmental Protection Division (EPD) has reviewed the Voluntary Investigation and Remediation Plan (VIRP) and application dated April 25, 2016, submitted for the above referenced property (the property) pursuant to the Georgia Voluntary Remediation Program Act (the Act). EPD has determined that the property is eligible for enrollment into the Georgia Voluntary Remediation Program (VRP). Transmitted herewith, please find a proposed consent order that, when executed, will supersede the original consent order, Consent Order EPD-WQ-HW-6104, under which clean-up of the property has been regulated. Execution of the proposed consent order will approve the VIRP and enroll the property in the VRP.

EPD's comments on the VIRP are attached. As specified in the proposed consent order, these comments must be addressed to EPD's satisfaction in future progress reports.

Please sign and date the proposed consent order and return it to this office by July 15, 2016. EPD will issue a public notice providing for a thirty (30) day comment period pursuant to Chapter 391-1-3-.01, "Public Participation in Enforcement of Environmental Statutes," prior to execution of the consent order. If EPD does not receive any substantive comments, the order will be executed and the property will be enrolled in the VRP. EPD will forward a copy of the executed consent order to you. If you have questions regarding the proposed order or comments, please contact Kevin Collins at 404-657-8610.

Sincerely,



Jeffrey W. Cown, Chief
Land Protection Branch

Encl: Proposed Consent Order
EPD Comments on VIRP

C: Adam Sowatska (via email – w/ enclosures)
Kirk Kessler, EPS (via email – w/ enclosures)

File: Precision Machine of Savannah, Inc. – VRP

ATTACHMENT

EPD Comments on VIRP
Precision Machine of Savannah
6 Telfair Place
Savannah, Chatham County, Georgia 31415

July 11, 2016

EPD offers the following comments on the Voluntary Investigation and Remediation Plan (VIRP) dated April 25, 2016:

1. The Type 2 and 4 risk reduction standards (RRSs) for soil and groundwater, calculated in the VIRP, are correct and approved. Please note the Type 1 RRS for Chromium III should be 1,200 milligrams per kilogram. Please revise this value in future Semi-Annual Progress Reports. In addition, please update groundwater summary tables with the approved regulatory standards and highlight exceedances on the table and update the text of the reports, as applicable.
2. In all future documents please post the reported analytical results, that comprise the environmental site conditions, on figures illustrating the sampling locations for all media
3. Field sampling forms and analytical reports were not included in the VIRP. In addition no potentiometric map was provided. Please include these in subsequent Semi-Annual Progress Reports.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

IN RE:)	
Precision Protective Coatings, Inc.)	
Precision Machine of Savannah, Inc.)	
6 and 8 Telfair Place)	Consent Order No. EPD-VRP-_____
Savannah, Georgia)	
)	
RESPONDENT)	

CONSENT ORDER

WHEREAS, Precision Protective Coatings, Inc. (hereinafter "Precision Protective Coatings" and Precision Machine of Savannah, Inc. (hereinafter "Precision Machine Savannah") are respectively responsible for a metal finishing facility and a metal machining facility located at 6 and 8 Telfair Place, Savannah, Chatham County, Georgia, comprising approximately 5.47 acres and identified as Tax Parcels 6-0737-01-009 and 6-0737-01-010 (hereinafter the "Property"); and

WHEREAS, Precision Protective Coatings and Precision Machine Savannah are hereinafter collectively the "Respondent";

WHEREAS, on September 16 and 18, 2014 the Respondent had a release of WS 8800 Coolant from chip bins on the property that consisted of a spill area of approximately 400 to 500 square feet; and

WHEREAS, the Environmental Protection Division (hereinafter "EPD") issued Consent Order No. EPD-WQ-HW-6104 which Respondent entered into on February 18, 2015, and in which Respondent committed to resolving documented water quality and hazardous waste violations; and

WHEREAS, Respondent entered into Consent Order No. EPD-WQ-HW-6104, Amendment 1 on November 23, 2015, in which Respondent committed to implementing a Corrective Action Plan (hereinafter "CAP"); and

WHEREAS, on April 25, 2016, Precision Machine Savannah submitted to EPD an application, including a Voluntary Investigation and Remediation Plan (hereinafter the "VIRP"), for enrollment of the Property into the Georgia Voluntary Remediation Program (hereinafter the "VRP"), established under the Georgia Voluntary Remediation Program Act, O.C.G.A. Section 12-8-100 et seq., as amended (hereinafter "VRP Act"); and

WHEREAS, all conditions of Consent Order No. EPD-WQ-HW-6104 as amended have been certified complete with the exception of Condition #3.g and Condition #3.1.; and

WHEREAS, EPD has determined that the Property is eligible for enrollment into the VRP; and

WHEREAS, the Respondent and EPD desire to enable Respondent's participation in the VRP with respect to the Property.

NOW, THEREFORE, it is hereby ORDERED by the Director and CONSENTED to by the Respondent, as follows:

1. As of the date of execution of this Order, all conditions of Consent Order EPD-WQ-HW-6104 as amended are fulfilled, with the exception of Condition #3.g and Condition #3.l, which are hereby superseded in their entirety and replaced with this Order, and as this Order may be amended.
2. Upon execution of this Order, Respondent's VRP application and VIRP dated April 25, 2016 are approved and the Property shall be deemed enrolled in the VRP.
3. Under the VRP, and subject to any relevant modifications thereto, the Respondent must comply with the following schedule for delineation and remediation of the Release, submission of a compliance status report, as required by EPD under the VRP Act, subject to modifications and extensions granted in writing by EPD, such modifications and extensions not to be unreasonably denied:
 - a. The Respondent must submit progress reports to EPD semi-annually, or at such longer interval as EPD may approve, pursuant to Section 12-8-107(b) of the VRP Act, as amended, with the first report due by the end of the sixth full month after the effective date of this Order.
 - b. EPD has reviewed the VRP application and agrees that Respondent has completed the horizontal delineation of the Release and associated constituents of concern on property where access is available as of the date of execution of this Order.
 - c. The Respondent submitted site specific Risk Reduction Standards ("RRS") with the VRP Application. EPD has reviewed those RRS and hereby approves the site-specific RRS for use at this Site.
 - d. EPD has reviewed the VRP application and agrees that Respondent has provided an adequate conceptual site model, including vertical delineation. Within six (6) months after the date of execution of this Order, Respondent shall finalize the VIRP and provide a cost estimate for implementation of remediation and associated continuing actions.
 - e. Within twelve (12) months after the date of execution of this Order, or other later date approved by the Director, e.g., if the Director concurs that completion of corrective action cannot feasibly be achieved within twelve (12) months after the date of execution of this Order, the Respondent shall submit the compliance status report, including the requisite certifications, required under the VRP Act.
 - f. Within sixty (60) days after Respondent's receipt from EPD of an invoice for any costs to EPD in reviewing the VRP application and subsequent documents that exceed the initial application fee, Respondent shall reimburse EPD for such costs.

4. The Respondent and one or more registered professional geologists or engineers shall be responsible to oversee the implementation of the VIRP in accordance with the provisions, purposes, standards, and policies of the VRP Act. EPD may, at its sole discretion, review and comment on documents submitted by the Respondent. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Respondent from complying with the specified schedule and the provisions, purposes standards and policies of the VRP Act and Order.
5. The Respondent must address EPD's comments dated July 11, 2016, and any comment letters addressing the investigation and remediation pursuant to the VRP Act to the satisfaction of the Director that the response is consistent with the provisions, purposes, standards, and policies of the VRP Act.
6. EPD's approval of the VIRP 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 the VIRP in whole or in part, if EPD reasonably determines that withdrawal is necessary to ensure compliance with applicable statutes and rules.
7. This Order shall terminate if and as of the date the Director concurs under Section 12-8-107(e) of the VRP Act, as amended, with the Respondent's certification that the Property complies with applicable cleanup standards.
8. Enrollment of the property in the VRP shall terminate (hereinafter the "Termination Date") sixty (60) days after either the Director or the Respondent provides written notification to the other party that enrollment of the Property in the VRP is being terminated, as provided in Section 12-8-107(d) of the VRP Act, as amended. As of the Termination Date, the Property and other properties affected by the Release shall be subject to the risk reduction standards promulgated at Section 391-3-19-.07 of the Rules for Hazardous Site Response, or such alternate standards as may be approved by the Director. The Respondent shall take those actions necessary to ensure compliance with these standards within a schedule approved by the Director.
9. Unless otherwise provided in this Order, the following notice provisions shall apply:
 - a. Notifications, submissions or other communications required by this Order, shall be made in writing and addressed as follows:

As to the Respondent:

Mr. David Johnson, Operations Director
c/o Precision Machine of Savannah
6 Telfair Place
Savannah, Georgia 31415

As to EPD:

Program Manager
Environmental Protection Division – Land Protection Branch
Response and Remediation Program
2 Martin Luther King Jr. Boulevard, Suite 1054
Atlanta, Georgia 30334

- b. Either party may, by written notice to the other party, change its designated representatives for receipt of notice or its notice address.
 - c. For purposes of the VRP deliverables referenced in Condition 3 hereof, EPD's receipt of a deliverable by the specified milestone due date via U.S. Mail, courier or hand delivery, or EPD's receipt of an electronic transmittal of a copy of the deliverable by the specified milestone due date confirming that the deliverable has been sent via U.S. Mail, courier or hand delivery, shall constitute timely submission of the deliverable under the VRP.
10. The individual signing this Order for the Respondent is duly authorized to enter into and bind the Respondent to the terms of the Order.

For purposes of enforcement under any applicable State Law, this Order shall be construed as and shall have the same force and effect as a final Order of the Director pursuant to the HWM Act, as amended, and the VRP Act, as amended.

This Consent Order shall be signed first by the Respondent and shall be deemed executed when signed by the Director of EPD.

It is so ORDERED, CONSENTED, AND AGREED to this _____ day of _____, 2016 (to be filled in by the Director upon his signature).

**FOR THE RESPONDENT,
PRECISION MACHINE OF SAVANNAH,
INC.**

**FOR THE ENVIRONMENTAL
PROTECTION DIVISION**

By: _____
(Signature)

(Printed Name)

TITLE: _____

DATE: _____

Richard E. Dunn, Director
Environmental Protection Division
Department of Natural Resources
State of Georgia