

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

Judson H. Turner, Director

February 8, 2016

VIA E-MAIL AND REGULAR MAIL

Rexmet Corporation
c/o Mr. John W. Rex
P.O. Box 270
Landsdale, PA 19446

Re: Annual VRP Status Report, December 21, 2015
Carolina Commercial Heat Treat Property, HSI # 10341
1690 Highway 138
Conyers, Rockdale County, Georgia
Tax Parcel 069001003L

Dear Mr. Rex:

The Georgia Environmental Protection Division (EPD) has reviewed the Annual VRP Status Report for the above referenced site. EPD offers the following comments, which should be addressed in accordance with the Voluntary Remediation Program (VRP) Act:

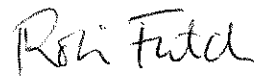
1. Table 2 lists the groundwater criteria which were calculated as part of the Vapor Intrusion Screening Level (VISL) as the maximum concentrations which indicate that vapor intrusion is not a threat for non-residential use of the site. Please note that Risk Reduction Standards (RRS) per the Rules for Hazardous Site Response are the applicable standard for confirming soil and/or groundwater compliance. These may be Type 1-4 RRS for those regulated substances identified as chemicals of concern (COCs) at the subject site. All calculated RRS must be submitted for review and approval by EPD prior to use as the applicable cleanup standard.
2. No discussion was provided regarding the sampling of passive diffusion bags (PDBs) and whether corresponding conventional purge samples were collected from the same well to assess the comparability of the data. Please include that discussion in subsequent reporting. Comment # 3 of EPD's August 25, 2014 correspondence requested that at least two quality assurance (QA) groundwater samples be collected for comparative purposes, consistent with the current QA sampling being conducted.
3. Please provide an update on the progress in developing groundwater Uniform Environmental Covenants (UECs) with the O'Reilly Automotive Inc. (Parcel ID 0710010003) and Carpenter E R CO, Inc. (Parcel ID - 071001002D) properties in subsequent reporting. In addition, please proceed with submitting draft UECs for the properties owned by Rexmet Corporation so that these may be revised and finalized.

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Rexmet must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by Rexmet. However, failure of EPD to respond to a submittal within any timeframe does not relieve Rexmet from complying with the provisions, purposes, standards and policies of the Act.

EPD anticipates receipt of the next VRP Status Report by November 30, 2016. If you have any questions regarding this matter, please contact Robin Futch, PG, PMP of the Response and Remediation Program at 404-657-8686.

Sincerely,

A handwritten signature in black ink that reads "Robin Futch". The signature is written in a cursive, slightly slanted style.

Robin Futch, P.G.
Acting Unit Coordinator
Response and Remediation Program

c: Keith Cole, Environ (via email)

File: HSI #10341

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Comments.doc