

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

August 25, 2014

VIA E-MAIL AND REGULAR MAIL

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

COPY

Re: Semiannual Groundwater Monitoring Report, May 22, 2014
Response to EPD Comments – VRP Application, May 22, 2014
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 Semiannual Groundwater Monitoring Report and the Response to EPD Comments, submitted for the above referenced site. EPD offers the following comments, which should be addressed in accordance with the Voluntary Investigation and Remediation Program (VIRP) Act:

1. EPD is in agreement with the revised surface water risk-based concentrations derived for the youth and adult trespasser scenarios (i.e., 12 µg/L based on wading in the drainage swale and 3.7 µg/L based on exposure while swimming in the pond) that were provided in the May 22, 2014 Response to EPD Comments.
2. EPD appreciates Rexmet's efforts to enroll the downgradient impacted properties in the VIRP as discussed in the Response to Comment No.1. Please continue to provide a status update on the negotiations in future progress reports.
3. EPD concurs with the use of passive diffusion bags (PDBs) for groundwater monitoring at the site. However, at least two quality assurance (QA) groundwater samples will be required for comparative purposes, consistent with the current QA sampling being conducted. Please note that to certify compliance, groundwater sampling must be done with standard purging and groundwater sample collection techniques and that PDB water samples would not be adequate.
4. The potentiometric maps in the Semiannual Groundwater Monitoring Report are not accurately drawn. EPD noted that groundwater elevations and the corresponding potentiometric contours are inconsistent and appear to be located incorrectly on Figures 3 and 4. For Figure 3 please recheck the location of the potentiometric contours for 825, 830, and 845. For Figure 4 please recheck the location of potentiometric contours for 820, 825, 830, 840, 845, and 850. Please add groundwater flow direction arrows to all future potentiometric contour maps.
5. For wells that are no longer sampled, e.g., MW-28D and MW-29D, please continue to include the previously collected groundwater data in Summary of Groundwater Data table

for reference purposes. Also, please show MW-28D and MW-29D on relevant figures for reference.

6. For the low-flow purging method, the pump intake should be placed near the mid-point of the screened interval (see Groundwater Sampling, USEPA SESDPROC-301-R3, Section 3.2.2). This was not done for many of the wells sampled according to the field sampling logs from both sampling events. Please place the pump intake at the recommended location in future sampling events.
7. The laboratory detection limits for tetrachloroethene, trichloroethene, and vinyl chloride for DUP-02 were reported in the April 2014 laboratory report at 25 ug/L. These should be reported at the relevant maximum contaminant level (MCL) for all future analyses.
8. Please continue to show the location of the former AS/SVE system points on Figure 2 – Monitoring and Surface Water Sampling Location Map in future reports.
9. Please note that all semi-annual progress reports are to include the signed and sealed PE/PG certification and supporting documentation as specified in the Voluntary Investigation and Remediation Plan (VIRP) checklist (<http://epd.georgia.gov/voluntary-remediation>).

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.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next VIRP semiannual progress report by November 22, 2014. 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,



Jason Metzger
Unit Coordinator
Response and Remediation Program

c: Keith Cole, Environ (via email)

File: HSI #10341